



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street  
San Francisco, Ca. 94105

24 AUG 1987

*① Matt - HWDMS  
Change**② M-F.*

Mr. Angelo Bellomo  
Regional Administrator  
Toxic Substances Control Division  
Department of Health Services  
107 South Broadway, Room 7182  
Los Angeles, CA 90012

Re: Trent Tube CAD 008 325 110

Dear Mr. Bellomo:

In response to your letter of May 27, 1987, we agree to exclude the above referenced facility from your inspection commitments. Copies of the Closure Certification dated March 11, 1985 and the post closure inspection of September 19, 1986 have been received and provide sufficient documentation to enable us to rescind the Part A for the above referenced facility.

Our data base will be changed to reflect the fact that the current tenant does not generate, store, treat or dispose of hazardous waste.

If you have not already done so, please submit a compliance monitoring and enforcement log (CMEL) for your September 19, 1986 inspection.

Sincerely,

Michael Feeley, Chief  
Policy and Program Management Section

cc: Paul Blais (DHS HQ)  
Caroline Cabis (DHS HQ)  
cc: Mel Knight (DHS SCS)  
James Hinton (DHS SCS)  
Nennet Alvarez (DHS SCS)

## DEPARTMENT OF HEALTH SERVICES

107 SOUTH BROADWAY, ROOM 7011  
LOS ANGELES, CA 90012



REC-11  
U.S. 11  
MAR 18 1985  
COMM-F

April 16, 1985

'85 APR 18 AM 10:40

Mr. Robert M. Phillips  
Trent Tube Division  
2188 South Church Street  
East Troy, WI 53120

Dear Mr. Phillips:

CERTIFICATION OF CLOSURE, TRENT TUBE FULLERTON FACILITY (CAD 008325110)

This letter is to acknowledge receipt of the Professional Engineer's Certification of Closure transmitted by Calocerinos Espina, dated March 11, 1985. The Department considers the facility closed.

Please be advised that this acknowledgement of facility closure is not a certification that your facility does not pose any environmental or public health threat nor does it remove any liability associated with past hazardous waste management practices at the site.

If you have any questions or comments, please contact Harry Sneh (213) 620-2380.

Sincerely,

John A. Hinton, P.E., Chief  
Facility Permitting Unit  
Southern California Section  
Toxic Substances Control Division

cc: U.S. Environmental  
Protection Agency  
215 Fremont Street  
San Francisco, CA 94105

Robert Holub  
Regional Water Quality  
Control Board  
Santa Ana Region  
6809 Indiana Ave., Suite 200  
Riverside, CA 92506

John Masterman  
Program Management Section  
714 P Street  
Sacramento, CA 95814

CRU 00123

MWNA-WZI 116480

BT 401-J-1 (10-86)

STATE OF  
CALIFORNIAP.O. BOX 647  
SACRAMENTO CA 95803

DUPLICATE -- KEEP FOR YOUR RECORDS

BOARD OF EQUALIZATION  
HAZARDOUS WASTE CONTROL ACCOUNT

8186

## NOTICE OF FACILITY FEE

Due on or before 11/1/86 for State Fiscal Year 7/1/86 to 6/30/87

CADD08325110

Mail to:

BOARD OF EQUALIZATION  
EXCISE TAX UNIT  
P.O. BOX 647  
SACRAMENTO CA 95803  
(916) 322 9070PO BOX 3068  
FULLERTON

CA 92634

36-00915

F02 Contingent closed

Read Instructions On  
Back Before PreparingMake Changes Above If  
Name or Address Incorrect

## FACILITY FEE PAYMENT SCHEDULE

A	B	C	D
TYPES AND SIZES OF FACILITIES.	NO. OF PERMITS	ANNUAL FEE	TOTAL ANNUAL FEES BY CATEGORY (Col B x C)
<b>DISPOSAL FACILITY</b> is a 1. hazardous waste facility used for the disposal of hazardous wastes.		\$61,270.00	
<b>LARGE TREATMENT FACILITY</b> is a treatment 2. facility which treats or recycles 1,000 or more tons of hazardous waste in any one month of the state's current fiscal year.		\$18,381.00	
<b>SMALL TREATMENT FACILITY</b> is a 3. treatment facility which does not meet the criteria for a large treatment facility.		\$12,254.00	
<b>LARGE STORAGE FACILITY</b> is a storage 4. facility which stores 1,000 or more tons of hazardous waste in any one month of the state's current fiscal year.		\$12,254.00	
<b>SMALL STORAGE FACILITY</b> is a 5. storage facility which does not meet the criteria for a large storage facility.		\$ 6,127.00	
6. <b>OTHER.</b> An explanation must be attached. See instructions on back.		\$ 00.00	
7. Total amount of annual fee(s). (Add amounts in column D)			\$
8. TOTAL AMOUNT DUE AND PAYABLE. (Divide amount on line 7 by 2)			\$

I hereby certify that this notice, including any accompanying statements  
is true and correct to the best of my knowledge and belief.

SIGNATURE

AND TITLE.....PHONE.(.....)

MAKE CHECK OR MONEY ORDER PAYABLE TO STATE BOARD OF EQUALIZATION

Always Write Your Account Number on Your Check or Money Order

MWNA-WZI 116481

**NOTICE OF FACILITY FEE**

**GENERAL**

Pursuant to Section 25205.2 of the Health and Safety Code, effective July 1, 1986, each operator of a facility shall pay a facility fee for each state fiscal year, or any portion thereof, to the State Board of Equalization. "Facility" means a hazardous waste storage, treatment, or disposal facility, including a resource recovery facility or waste transfer station, which has been issued a permit or a grant of interim status by the Department of Health Services. This includes facilities accepting infectious waste for disposal. "Facility" does not include any facility operated by a local government agency which is used exclusively for household hazardous waste collection. The Department of Health Services has identified you as an operator of a facility, therefore, you must complete the Facility Fee Payment Schedule on the front of this notice and remit any amounts due to the State Board of Equalization. The total fee is due in equal semiannual installments on 11/1/86 and 4/1/87. If you do not receive a billing for the second installment, it is your responsibility to make timely payment. Late payments are subject to a penalty of 10% (.10) and interest at the rate then in effect.

**FILING REQUIREMENTS**

The fee is due for each permit and/or grant of interim status you hold even if you hold more than one at a given location. You must report the number of permits and/or grants of interim status by the type and size as indicated on the Facility Fee Payment Schedule. If a permit or grant of interim status falls under more than one category, you must include that permit or grant of interim status in the category with the greater rate. For example, if you hold a permit allowing you to operate as both a LARGE TREATMENT FACILITY with a fee of \$18,381.00 (line 2) and a SMALL STORAGE FACILITY with a fee of \$6,127.00 (line 5) you must count that permit as being subject to the greater LARGE TREATMENT FACILITY fee. If you require additional assistance, please call one of the following Department of Health Services offices:

Berkeley: (415) 540 2043  
Fresno: (209) 445 5938  
Los Angeles: (213) 620 2380  
Sacramento: (916) 739 3145  
San Diego: (619) 236 4717

**PREPARATION OF FACILITY FEE PAYMENT SCHEDULE**

**COLUMN A. TYPES AND SIZES OF FACILITIES.**

LINE 1 - 5. Determine the type and size for each permit and/or grant of interim status as explained in the FILING REQUIREMENTS above.

LINE 6. OTHER. If you are not required to pay a fee, you must attach a detailed explanation. If you applied for closure and did not accept hazardous waste after June 30, 1986, you must enclose a copy of your request for closure. If you have a permit variance granted by the Department of Health Services, you must attach a copy.

**COLUMN B. NO. OF PERMITS.** Enter the number of permits and/or grants of interim status you hold for each type of facility.

**COLUMN D. TOTAL ANNUAL FEE DUE BY CATEGORY.** Multiply Column B (No. of Permits) x Column C (Fee) for lines 1 thru 5. Enter the result for each line in Column D.

LINE 7. Add all amounts in Column D and enter the total.

LINE 8. TOTAL AMOUNT DUE AND PAYABLE. Divide the amount on line 7 by 2. This is the amount due from you.

If during the course of the state's current fiscal year you find that you fall under a category other than the category originally reported, you must notify the Board.

BT 401-J-1 (10-86)

STATE OF  
CALIFORNIA

P.O. BOX 647  
SACRAMENTO CA 95803

BOARD OF EQUALIZATION  
HAZARDOUS WASTE CONTROL ACCOUNT

8186

**NOTICE OF FACILITY FEE**

Due on or before 11/1/86 for State Fiscal Year 7/1/86 to 6/30/87

CAD008325110

Mail to:

BOARD OF EQUALIZATION  
EXCISE TAX UNIT  
P.O. BOX 647  
SACRAMENTO CA 95803  
(916) 322 9070

TRENT TUBE DIV FULLERTON OPERATION  
PO BOX 3068  
FULLERTON CA 92634

Read Instructions On  
Back Before Preparing

Make Changes Above If  
Name or Address Incorrect

**FACILITY FEE PAYMENT SCHEDULE**

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I hereby certify that this notice, including any accompanying statements is true and correct to the best of my knowledge and belief.

SIGNATURE

AND TITLE.....PHONE.(.....)

**MAKE CHECK OR MONEY ORDER PAYABLE TO STATE BOARD OF EQUALIZATION**  
**Always Write Your Account Number on Your Check or Money Order**

MWNA-WZI 116483

FY 85 COMPLIANCE MONITORING AND ENFORCEMENT LOG

INSPECTOR: OSBORNE, M.

1. EPA ID: CA0008385110 3. RCRA FACILITY: ☒ 4. FACILITY:  
 / / Major TSD ☒ Generator  
 / / Non-Major TSD / / Trans  
 / / Other  
 2. HANDLER NAME: TRENT TUBE  
 5. DATE OF INITIAL EVALUATION WHICH IS THE BASIS FOR THIS REPORT: 9/19/86 5a. RESPONSIBLE AGENCY: S = State (DHS / SWRCB)  
 B = Contractor/State (County)

6. TYPE OF EVALUATION COVERED BY THIS REPORT: (circle all that apply)  
 (Others)  
 1 = Evaluation Inspection (annual/ISD) 6 = Citizen Complaint  
 2 = Sampling inspection 7 = Part B Call In  
 3 = Record Review 8 = Withdrawal Candidate  
 4 = Ground Water Monitoring Evaluation 9 = Closed Facility  
 5 = Follow Up 0 = General  
 A = Meetings

7. DATE OF EVALUATION COVERED BY THIS REPORT (enter only if different from 5): 1/1/

8. VIOLATIONS:

Class of Violation	Area of Violation						
	GWM	CL/PC	Fin. Res	Pt. B	Cmpl. Sch	Manifest	Other
I		1-0 9-0					1-0 9-0
II		1-0 9-0					1-0 9-0

Comments

*closure was certified and approved in April of 1985*

ENFORCEMENT ACTIONS:

Class	Area of Violation	Type (use code)	Date Action Taken	Compliance Dates		Penalty		Agcy (code)
				Scheduled	Actual	Assessed	Collected	

Comments:

MWNA-WZI 116484

Inspection Report  
U.S. Environmental Protection Agency  
Region 9  
Toxics and Waste Management Division  
Field Operations Branch

(DOHS - SCS)

DATE 9/19/86

CA D008325110

INSPECTOR MO

Purpose:

Facility Name: TRENT TUBE

Street: 2100 E. Orangethorpe Ave.

City: Fullerton State: CA

Zip Code: 92634

EPA ID number: CAD 008325110

Report Number:

Date of Investigation: 9/19/86

EPA Inspector(s): N.A.

State Inspector(s): Mary Osborne

Facility Representative(s):

Report Prepared By:

Mary Osborne

Autocar  
Sale/Leasing  
R.V. Storage - (714) 680-0295  
D714-680-3815

} Next  
to  
Paint  
Store



Form A - Interim Status Standards for Facilities  
that Treat, Store or Dispose of Hazardous Waste

I. General Information:

- Current:*  
(A) Operator: Autocar / Sales & Leasing and R.V. Storage  
Street: 2100 E. Orangethorpe  
City: Fullerton State: CA Zip Code: \_\_\_\_\_  
DATE: 9/19/86  
(B) Owner: TRENT TUBE  
Street: 2188 S. Church St.  
City: E. Troy State: WI Zip Code: 53120  
CA D008325110  
INSPECTOR: [Signature]  
(C) Site Activity: TRENT TUBE IS CLOSED

\_\_\_\_ Generation: Complete Form B      \_\_\_\_ Small Quantity Generator:  
\_\_\_\_ Transportation: Complete Form C      \_\_\_\_ Complete Form D  
\_\_\_\_ Recycler: Complete Form E

<u>Storage:</u>	<u>Disposal:</u>
____ Container (S01)	____ Injection Well (D79)
____ Tank (S02)	____ Landfill (D80)
____ Waste Pile (S03)	____ Land Application (D81)
____ Surface Impoundment (S04)	____ Ocean Disposal (D82)
	____ Surface Impoundment (D83)

<u>Treatment:</u>	<u>Process Code:</u>	<u>Design Capacity:</u>
____ Tank (T01)	_____	_____
____ Surface Impoundment (T02)	_____	_____
____ Incinerator (T03)	_____	_____
____ Other (T04)	_____	_____

DATE.....9/19/86  
CA D008325110  
INSPECTOR.....MO

I. General Information: - Continued

(D) Nature Of Business:

The facility was officially closed (certification) in Dec. of 1984. The site was acknowledged as closed by the State Department of Health (see letter) in April of 1985.

(E) Description Of Facility Processes:

N/A — Facility no longer in operation.  
A field check confirmed that the site is now operated by an automobile sales and leasing company — (714) 680-3815.

DATE.....

9/19/86

I. General Information: - Continued

C. T 008325110

INSPECTOR.....

MO

(P) Report Attachments:

Certification of closure  
Letter from State Health and  
engineer's certification.

II. Interim Status:  
(Part 270 Subpart G)

Yes No Comments

DATE 9/19/86

CA D008345110

INSPECTOR Mo

(A) Qualifying For Interim Status:

1. For the existing facility to be treated as having been issued a permit, the facility must have:

a. Submitted a notification of H.W. activity (270.70a.1)?

b. Submitted Part A of the permit application (270.70a.2)?

c. Achieved compliance with RCRA interim status standards (270.70b)?

N/A - Facility is closed

(B) Operating During Interim Status:

1. Has the facility complied with the following restrictions:

a. Has only treated, stored or disposed of H.W. specified in the Part A (270.71a.1)?

b. Has only employed processes specified in the Part A (270.71a.2)?

c. Has not exceeded design capacities specified in the Part A (270.71a.3)?

(C) Changes During Interim Status:

1. Has a revised Part A been submitted prior to the following changes:

a. T/S/D of H.W. not previously identified in the Part A (270.72a)?

b. Increases in design capacity of processes (270.72b)?

c. Changes in or additions to processes (270.72c)?

d. Change in ownership (270.72d)?

e. Have the changes made not amounted to reconstruction (270.72e)?

III. General Facility Standards:  
(Part 265 Subpart B)

DATE 9/19/86

Yes No Comments

C. 0008325110

INSPECTOR MO

(A) Required Notices:

1. Has the RA been notified regarding the receipt of H.W. from a foreign source (265.12a)?  
CAC 67101(a)
2. Before transferring ownership, has the facility notified the new owners in writing of the requirements of Parts 265 and 122 (265.12b)?  
CAC 67101(c)

N/A Facility is closed.

(B) General Waste Analysis:

1. Has the facility obtained a detailed chemical and physical analysis of each H.W. (265.13a.1)?  
CAC 67102 (a)(1)
2. Does the analysis contain all information that must be known to properly treat, store or dispose of the H.W. (265.13a.1)?  
CAC 67102(a)(1)
3. Does the facility have records documenting the required H.W. analysis, e.g., lab reports, published data, generator supplied data (265.13a.2)?  
CAC 67102(a)(2)
4. Has the analysis been repeated to ensure that it is accurate and up-to-date (265.13a.3)?  
CAC 67102(a)(3)
5. Is the analysis repeated when there is a change in the process (265.13a.3)?  
CAC 67102(a)(3)(A)
6. For off-site facilities, is the analysis repeated when the H.W. received does not match the H.W. designated on the manifest (265.13a.3)?  
CAC 67102 (a)(3)(B)
7. For off-site facilities, does the facility inspect or analyze each movement of H.W. to verify that the H.W. received matches the identity of the H.W. specified on the manifest (265.13a.4)?  
CAC 67102 (a)(4)

DATE 9/19/86

C 1008345110

INSPECTOR JMO

III. General Facility Standards: - Continued  
(Part 265 Subpart B)

	Yes	No	Comments
8. Does the facility have a detailed waste analysis plan (265.13b)? CAC67102(b)		<u>N/A</u>	<u>Facility is closed.</u> <u>- no longer at site</u>
9. Does the facility follow the procedures specified in the waste analysis plan (265.13b)? CAC 67102(b)			
10. Does the waste analysis plan contain the following elements:			
a. Parameters of analysis of each H.W. handled (265.13b.1)? CAC67102(b)(1)			
b. Rationale for the selection of each parameter (265.13b.2)? "			
c. Test methods used to obtain a representative sample of H.W. (265.13b.3)? CAC67102(b)(3)			
d. Frequency which each analysis will be repeated (265.13b.4)? CAC67102(b)(4)			
e. For off-site facilities, the analysis that generators have agreed to supply (265.13b.5)? CAC67102(b)(5)			
11. For off-site facilities, does the plan specify procedures for inspection or analysis of each movement of H.W. (265.13c)? CAC67102(c)			
12. For off-site facilities, does the plan contain the following elements:			
a. Description of procedures used to identify each movement of H.W. (265.13c.1)? CAC67102(c)(1)			
b. Description of the sampling method used to obtain a representative sample of the H.W. (265.13c.2)? CAC67102(c)(2)			
(C) Security:			
1. Do security measures include:			
a. 24-hour surveillance (265.14b.1)? CAC67103(b)(1)			

DATE 9/19/86

III. General Facility Standards: - Continued <sup>GA D008325110</sup>  
(Part 265 Subpart B)

INSPECTOR MO

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
b. Artificial or natural barriers and controlled entry (265.14b.2)? CAC67103(b)(2)		<u>N/A</u>	<u>Facility is closed</u> <u>- no longer at site</u>
c. Signs with the legend "Danger-Unauthorized Personnel Keep Out" posted at entrances to active portions of facility (265.14c)? CAC67103(c)			
(D) General Inspection Requirements:			
1. Does the facility inspect for equipment malfunctions and deterioration, operator errors, and H.W. discharges (265.15a)? CAC67104(a)			
2. Does the facility follow a written inspection schedule (265.15b.1)? CAC67104(b)(1)			
3. Is the schedule kept at this facility (265.15b.2)? CAC67104(b)(2)			
4. Does the schedule identify types of problems that are expected from malfunction, operator error, deterioration or discharges of all: (265.15b.3) CAC67104(b)(3)			
a. monitoring equipment?			
b. safety, emergency equipment?			
c. security equipment?			
d. operating and structural equipment?			
5. Does the schedule indicate the frequency of inspection for each item (265.15b.4)? CAC 67104(b)(4)			
6. Does the schedule include daily inspections of loading and unloading areas (265.15b.4)? CAC67104(b)(4)			
7. Has the facility taken remedial action to correct the problems revealed on an inspection (265.15c)? CAC67104(c)			

III. General Facility Standards: - Continue  
(Part 265 Subpart B)

DATE 9/19/86

CA D008325110

	Yes	No	Comments
8. Are inspections recorded in an inspection log (265.15d)? CAC67104(d)			INSPECTOR <i>MO</i> <i>Facility is closed</i>
9. Does the log include: (265.15d) CAC67104(d)			<i>no longer at site.</i>
a. Date and time of inspection?			
b. Name of inspector?			
c. Observations recorded?			
d. Date and nature of repairs or other remedial actions?			
10. Are inspection records kept for at least 3 years (265.15d)? CAC67104(d)			
(E) Personnel Training:			
1. Does the facility have a personnel training program (265.16a.1)? CAC67105(a)(1)			
2. Is it directed by a person trained in H.W. management procedures (265.16a.2)? CAC67105(a)(2)			
3. Does the program include training in: (265.16a.3) CAC67105(a)(3)			
a. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment?			
b. Emergency procedures including contingency plan implementation?			
4. Do new personnel receive required training within 6 months (265.16b)? CAC67105(b)			
5. Do personnel take part in an annual review of the initial training (265.16c)? CAC67105(c)			



III. General Facility Standards: - Continued  
(Part 265 Subpart B)

	Yes	No	Comments
6. Do personnel training records include: (265.16d) CAC67105(a)			N/A Facility is closed - no longer at site.
a. Job titles? CAC67105(a)(1)			
b. Job Descriptions? CAC67105(a)(2)			
c. Descriptions of training? CAC67105 (a)(3)			
b. Records of training? CAC67105(a)(4)			
(F) Requirements For Ignitable, Reactive, Or Incompatible Wastes:			DATE..... 9/19/86
1. Are the following precautions taken to prevent accidental ignition or reaction: (265.17a) CAC67106(a)			C# D008325110
a. Separation and protection from ignition sources?			INSPECTOR..... MO
b. No smoking signs in hazard areas?			
2. Is the T/S/D of ignitable, reactive and incompatible waste conducted so that it does not: (265.17b)			
a. Generate extreme heat or pressure, fire or explosion, or violent reaction? CAC67106(b)(1)			
b. Produce uncontrolled toxic or flammable mists, fumes, dusts or gases? CAC67106(b)(2)/(3)			
c. Damage structural integrity of H.W. containment devices? (e.g., tanks, containers, liners) CAC67106(b)(4)			
d. Threaten human health or the environment? CAC67106(b)(5)			

IV. Preparedness and Prevention:  
(Part 265 Subpart C)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(A) Is the facility designed, constructed, maintained, and operated to minimize the possibility of fire, explosion, or releases of H.W. or H.W. constituents to air, soil, or surface water which could threaten human health or the environment (265.31)? CAC67120(a)			N/A Facility is closed
(B) Required Equipment: CAC67121			- no longer at site.
1. Does the facility have the following equipment where applicable:			
a. Internal communications or alarm systems (265.32a)? CAC67121(a)			
b. Telephone or 2-way radios at the scene of operation (265.32b)? CAC67121(b)			DATE.....9/19/86
c. Portable fire extinguishers with water, foam, inert gas, dry chemical; spill control and decontamination equipment (265.32c)? CAC67121(c)			CA D008345110
d. Water at adequate volume and pressure or foam producing equipment or automatic sprinklers (265.32d)? CAC67121(d)			INSPECTOR.....JMO
(C) Testing And Maintenance Of Equipment:			
1. Does the facility test and maintain emergency equipment in operable condition (265.33)? CAC67122			
(D) Access To Communications Or Alarm Systems:			
1. Do personnel in areas where H.W. is being handled have immediate access to these systems (265.34)? CAC67123			
(E) Required Aisle Space:			
1. Is there adequate aisle space for unobstructed movement of fire, spill control and decontamination equipment in an emergency (265.35)? CAC67124			

IV. Preparedness and Prevention: - Continued  
(Part 265 Subpart C)

Yes   No   Comments

(F) Arrangements With Local Authorities:

CAC67126

1. Has the facility made the following arrangements:

a. Arrangements to familiarize police, fire dept., and emergency response team with H.W. operations (265.37a.1)?

CAC67126(a)(1)

b. Agreements designating primary emergency authority (265.37a.2)?

CAC67126(a)(2)

c. Agreements with State emergency response teams, contractors and equipment suppliers (265.37a.3)?

CAC67126(a)(3)

d. Arrangements to familiarize local hospitals with the properties of H.W. and the types of potential injuries and illnesses from exposure to H.W. (265.37a.4)?

CAC 67126(a)(4)

2. Did the facility document in the operating record any refusal by State or local authorities to enter into such arrangements (265.37b)?

CAC67126(a)

*NA*   *Facility is no longer in operation.*

DATE.....*9/19/86*

CA 0008325110

INSPECTOR.....*MO*

V. Contingency Plan and Emergency Procedures:  
(Part 265 Subpart D)

	Yes	No	Comments
(A) Does the facility have a contingency plan (265.51a)? CAC67140(a)			<i>n/a Facility is no longer in operation.</i>
(B) Content Of Contingency Plan:			
1. Does the plan describe actions personnel must take to comply with §§ 265.51 & 265.56 in response to fires, explosions, or unplanned releases of H.W. (265.52a)? CAC67141(a)			
2. Does the plan describe arrangements agreed by police, fire dept., hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to § 265.37 (265.52c)? CAC67141(c)			DATE <i>9/19/86</i> CA 0008345110 INSPECTOR <i>MO</i>
3. Does the Plan list names, addresses, and phone numbers (office & home) of all persons qualified to act as emergency coordinators (265.52d)? (list in order of responsibility) CAC67141(d)			
4. Does the plan list all emergency equipment including the location and physical description of each item on the list and a brief outline of its capability (265.52e)? CAC67141(e)			
5. Does the plan include an evacuation plan for personnel and a description of signals to begin evacuation, evacuation routes and alternate routes (265.52f)? CAC67141(f)			
(C) Copies of Contingency Plan:			
1. Is the plan maintained at the facility (265.53a)? CAC67142(a)			
2. Has the plan been submitted to all local emergency organizations (265.53b)? CAC67142(b)			

V. Contingency Plan and Emergency Procedures: - Con't.  
(Part 265 Subpart D)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(D) Amendment Of Contingency Plan:			
1. Has the plan been reviewed and immediately amended when required (265.54)? CAC67143			N/A Facility is no longer in operation
(E) Emergency Coordinator:			
1. Is the coordinator familiar with all aspects of site operation and emergency procedures (265.55)? CAC67144			
2. Does the coordinator have authority to carry out the contingency plan (265.55)? CAC67144			
(F) Emergency Procedures:			
1. If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in § 265.56 (265.56)? CAC67145			

DATE.....9/19/86

CA 0008325110

INSPECTOR.....MO

VI. Manifest System, Recordkeeping, and Reporting:  
(Part 265 Subpart E)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(A) Use of Manifest System: CAC67161			
1. Does the facility comply with the following manifest requirements:			
a. Sign and date each copy of the manifest (265.71a.1)? CAC67161(a)(1)	N/A		Facility is no longer in operation.
b. Note any significant * discrepancies in the manifest (265.71a.2)? CAC 67161(a)(2)			
c. Give transporter one copy of the signed manifest (265.71a.3)? CAC67161(a)(3)			
d. Within 30 days after delivery, send a copy of the manifest to the generator (265.71a.4)? CAC67161(a)(4)			
2. Are records of past shipments retained for 3 years (265.71a.5)? CAC67161(a)(5)			DATE 9/19/96
(B) Manifest Discrepancies:			
1. Upon discovering a significant discrepancy, has the facility made an attempt to reconcile the discrepancy with the generator or transporter (265.72b)? CAC67162(b)			CA D008325110 INSPECTOR MJO
2. For discrepancies not reconciled within 15 days, has the facility followed the required reporting procedures (265.72b)? CAC67162(b)			
(C) Operating Record:			
1. Does the facility maintain an operating record (265.73a)? CAC67163(a)			
* Significant discrepancies are:			
1. For bulk waste; variations > 10% in weight			
2. For containerized waste; variations > one drum			
3. Obvious differences such as waste solvent substituted for waste acid			

**VI. Manifest System, Recordkeeping, and Reporting: - Con't**  
(Part 265 Subpart E)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
2. Does the operating record contain the following information:			
a. A description and the quantity of each waste received (265.73b.1)? CAC67163(b)(1)	<u>N/A</u>		<u>Facility is no longer in operation.</u>
b. The method(s) and date(s) of its treatment, storage or disposal as required by Appendix I (265.73b.1)? CAC67163(b)(1)	_____	_____	_____
c. The location of each waste within the facility and the quantity at each location (265.73b.2)? (This information must include cross-references to specific manifest numbers.) CAC67163(b)(2)	_____	_____	DATE <u>9/19/86</u>
d. For disposal facilities, the location and quantity of each waste is recorded on a map or diagram of each cell or disposal area (265.73b.2)? CAC67163(b)(2)	_____	_____	C. P 008345110 INSPECTOR <u>AMO</u>
e. Records and results of all waste analysis and trial tests (265.73b.3)? CAC67163(b)(3)	_____	_____	_____
f. Reports detailing all incidents that required implementation of the contingency plan (265.73b.4)? CAC67163(b)(4)	_____	_____	_____
g. Records and results of operator inspections (265.73b.5)? CAC67163(b)(5)	_____	_____	_____
h. Monitoring data (265.73b.6)? CAC67163(b)(6)	_____	_____	_____
i. All closure and post-closure costs as applicable (265.73b.7)? CAC67163(b)(8)	_____	_____	_____
(D) Availability, Retention, Disposition Of Records:			
1. Are all records including plans available for inspection (265.74a)? CAC67164(a)	_____	_____	_____
2. Have copies of records of H.W. disposal locations and quantities under § 265.73b.2 been submitted to the RA and local land authority upon closure of the facility (265.74c)? CAC67164(c)	_____	_____	_____

VI. Manifest System, Recordkeeping, and Reporting: - Con't.  
(Part 265 Subpart E)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(E) Biennial Report: Annual Report (Calif.) CAC67165			
1. Has the facility submitted a biennial report to the RA by March 1 of each even numbered year (265.75)?			N/A Facility is no longer in operation.
2. Was the report submitted on EPA form 8700-13B and cover facility activities during the previous calendar year ( 265.75)?			
3. Does the report include the following information: (265.75)			DATE.....9/19/86
a. EPA identification number, name and address of the facility? CAC 67165 (a)			C 0008325110
b. Calendar year covered by report? CAC 67165 (b)			INSPECTOR.....MO.....
c. For off-site facilities, the EPA identification number of each generator? CAC 67165 (c)			
d. Description and quantity of each H.W. received and, for off-site facilities, the EPA identification number of each generator listed with this information? CAC 67165 (d)			
e. Methods of treatment, storage, or disposal for each H.W.? CAC 67165 (e)			
f. Monitoring data under § 265.94a.2.ii and iii and b.2 ? CAC 67165 (h)			
g. Most recent closure and post-closure cost estimates? CAC 67165(f)			
h. Required certification? CAC 67165(g)			



VI. Manifest System, Recordkeeping, and Reporting: - Con't  
(Part 265 Subpart E)

Yes No Comments

(F) Unmanifested Waste Report:

1. For a facility that has accepted a H.W. from an off-site source without an accompanying manifest, was a report containing the required information submitted to the RA within 15 days after receiving the H.W. (265.76a-g)?  
CAC67166(a-g)

NA Facility is no longer in operation

(G) Additional Reports:

1. Has the facility reported to the RA: (265.77)
  - a. Releases, fires and explosions?  
CAC 67167(a)
  - b. Ground-water contamination and monitoring data?  
CAC 67167(c)
  - c. Facility closure?  
CAC67167(b)

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DATE.....9/19/86

C. D008325110

INSPECTOR.....M.O.

VII. Ground-Water Monitoring:  
(Part 265 Subpart F)

DATE.....9/19/96  
CA 0008325110  
INSPECTOR.....7110

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(A) Has a ground-water monitoring program (capable of determining the facility's impact on the quality of ground-water in the uppermost aquifer underlying the facility) been implemented (265.90a)?	<u>1</u>	---	Not Evaluated
(B) Ground-Water Monitoring System:			
1. Has at least one monitoring well been installed in the uppermost aquifer hydraulically upgradient from the limit of the waste management area (265.91a.1)?	---	---	
a. Are ground-water samples from the uppermost aquifer representative of background ground-water quality and not affected by the facility? (as ensured by proper well number, locations and depths) (265.91a.1)	---	---	
2. Have at least three monitoring wells been installed hydraulically down-gradient at the limit of the waste management area (265.91a.2)?	---	---	
a. Do well numbers, locations and depths ensure prompt detection of any statistically significant amounts of H.W. or H.W. constituents that migrate from the waste management area to the uppermost aquifer (265.91a.2)?	---	---	
3. Have the locations of the waste management areas been verified to conform with information in the ground-water program (265.91b)?	---	---	
a. If the facility contains multiple waste management components, is each component adequately monitored (265.91 b & b.2)?	---	---	

VII. Ground-Water Monitoring: - Continued  
(Part 265 Subpart F)

Yes No Comments

DATE.....

C' 0008325110

INSPECTOR.....

4. Do the numbers, locations, and depths of the monitoring wells agree with the data in the ground-water monitoring system program (265.91b)?

Not Evaluated

5. Well completion details: (265.91c)

- a. Are wells properly cased?

- b. Are wells properly screened and packed where necessary to enable sampling at appropriate depths?

- c. Are annular spaces properly sealed to prevent contamination of ground-water?

(C) Sampling And Analysis:

1. Has a ground-water sampling and analysis plan been developed (265.92a)?

- a. Has it been followed?

- b. Is the plan kept at the facility?

- c. Does the plan include procedures and techniques for:

- i. Measurement of ground-water surface elevations (265.92a.1)?

- ii. Sample collection (265.92a.1)?

- iii. Sample preservation (265.92a.2)?

- iv. Sample shipment (265.92a.2)?

- v. Analytical procedures (265.92a.3)?

- vi. Chain of custody control (265.92a.4)?

VII. Ground-Water Monitoring: - Continued  
(Part 265 Subpart F)

DATE 9/19/86

CA 000835110

INSPECTOR MO

2. Are the required parameters in ground-water samples being tested quarterly for the first year (265.92b and 265.92c.1)?

Yes No Comments

Not Evaluated

a. Are the ground-water samples analyzed for parameters characterizing the suitability of the ground-water as a drinking water supply \* (265.92b.1)?

b. Are the ground-water samples analyzed for parameters establishing ground-water quality \* (265.92b.2)?

c. Are the ground-water samples analyzed for parameters used as indicators of ground-water contamination \* (265.92b.3)?

2. For each indicator parameter are at least four replicate measurements obtained at each upgradient well for each sample obtained during the first year of monitoring (265.92c.2)?

3. Are provisions made to calculate the initial background arithmetic mean and variance of the respective parameter concentrations or values obtained from the upgradient well(s) during the first year (265.92c.2)?

\* EPA interim primary drinking water standards:  
Arsenic, Barium, Cadmium, Chromium, Fluoride, Lead, Mercury, Nitrate(as N), Selenium, Silver, Endrin, Lindane, Methoxychlor, Toxaphene, 2-4 D, 2,4,5-TP, Silver, Radium, Gross Alpha, Gross Beta, Turbidity, Coliform Bacteria.

Parameters establishing ground-water quality:  
Chloride, Iron, Manganese, Phenols, Sodium, Sulfate.

Parameters used as indicators of ground-water contamination:  
pH, Specific Conductance, Total Organic Carbon, Total Organic Halogen.

VII. Ground-Water Monitoring: - Continued  
(Part 265 Subpart F)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
4. For facilities which have completed first year ground-water sampling and analysis requirements:			
a. Have samples been obtained and analyzed for the ground-water quality parameters at least annually (265.92d.1)?			Not Evaluated
b. Have samples been obtained and analyzed for the indicators of ground-water contamination at least semi-annually (265.92d.2)?			
5. Were ground-water surface elevations determined at each well each time a sample was taken (265.92e)?			
D) Preparation, Evaluation, And Response:			
1. Has an outline of a ground-water quality assessment program been prepared (265.93a)?			
a. Does it describe a program capable of determining:			
i. Whether H.W. or H.W. constituents have entered the ground-water (265.93a.1)?			
ii. The rate and extent of migration of H.W. or H.W. constituents (265.93a.2)?			
iii. Concentrations of H.W. or H.W. constituents in ground-water (265.93a.3)?			
2. After the first year of monitoring, have at least 4 replicate measurements of each indicator parameter been obtained for samples taken for each well (265.93b)?			

DATE.....9/19/81.....  
CA 0008325110  
INSPECTOR.....JMC.....

VII. Ground-Water Monitoring: - Continued  
(Part 265 Subpart F)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
a. Were the results compared with the initial background means from the upgradient well(s) determined during the first year (265.93b)?			
i. Was each well considered individually (265.93b)?			
ii. Was the Student's t-test used (at the 0.01 level of significance) (265.93b)?			
b. Was a significant increase (or pH decrease) found in the:			
i. Upgradient wells?			
ii. Downgradient wells?			
If "Yes", complete the Compliance Form For A Facility Which May Be Affecting Ground-Water Quality.			
3. Were the ground-water surface elevations evaluated annually to determine whether the monitoring wells are properly placed (265.93f)?			
4. If it was determined that modification of the number, location or depth of monitoring wells was necessary, was system brought into compliance with 265.91a (265.93f)?			
(E) Recordkeeping And Reporting:			
1. Have records been kept of analysis for parameters in 265.92c and d (265.94a.1)?			
2. Have records been kept of ground-water surface elevations taken at the time of sampling for each well (265.94a.1)?			

DATE 9/19/86  
C'D 008325110  
INSPECTOR MO  
Not Evaluated

VII. Ground-Water Monitoring: - Continued  
(Part 265 Subpart F)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
3. Have records been kept of required evaluations in 265.93b (265.94a.1)?	---	---	Not Evaluated
4. Have the following been submitted to the RA: (265.94a.2)			
a. Initial background concentrations of parameters listed in 265.92b within 15 days after completing each quarterly analysis required during the first year?	---	---	
b. For each well, have any parameters whose concentrations or values have exceeded the maximum contaminant levels allowed in drinking water supplies been separately identified?	---	---	
c. Annual reports including:			
i. Concentrations or values of parameters used as indicators of ground-water contamination for each well along with required evaluations under 265.93b?	---	---	
ii. Any significant differences from initial background values in upgradient wells separately identified?	---	---	
iii. Results of the evaluation of ground-water elevations?	---	---	

DATE.....9/19/86

CA 0008325110

INSPECTOR.....MIO

VII. Ground-Water Monitoring: - Continued  
(Part 265 Subpart F)

Compliance Form For A Facility Which May Be Affecting  
Ground-Water Quality

	<u>Yes</u>	<u>No</u>	<u>Comments</u>	<u>DATE</u> .....9/19/96
1. Have comparisons of ground-water contamination indicator parameters for the upgradient well(s) shown a significant increase (or pH decrease) over initial background?				0008325110 IN P CTOR.....MO
a. If "Yes", has this information been submitted to the RA according to 265.94a.2.ii (265.93c.1)?				Not Evaluated
2. Have comparisons of indicator parameters for the downgradient wells shown a significant increase (or pH decrease) over initial background?				
a. If "Yes", were additional ground-water samples taken for those down-gradient wells where the significant differences was determined (265.93c.2)?				
i. Were samples split in two?				
ii. Was the significant differences due to human (e.g., laboratory) error?				
If "Yes", do not continue				
3. If significant differences were not due to error, was a written notice sent to the RA within 7 days of confirmation (265.93d.1)?				
4. Within 15 days of notification to the RA was a certified ground-water quality assessment plan submitted (265.93d. . .)				



VII. Ground-Water Monitoring: - Continued  
(Part 265 Subpart F)

Compliance Form For A Facility Which May Be Affecting  
Ground-Water Quality

9/19/86  
008325110  
IN.P. CTOR. *MO*

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
5. Does the ground-water quality assessment plan specify: (265.93d.3)			
a. Monitoring well information including well numbers, locations and depths?			Not Evaluated
b. Sampling methods?			
c. Analytical methods?			
d. Evaluation methods?			
e. Schedule of implementation?			
6. Does the plan allow for determination of: (265.93d.4)			
a. Rate and extent of migration of H.W. or H.W. constituents?			
b. Concentrations of the H.W. or H.W. constituents?			
7. Is it indicated that the first determination was made as soon as technically feasible (265.93d.5)?			
a. Within 15 days after the first determination was a written report containing the assessment of ground-water quality submitted to the RA?			
8. Was it determined that H.W. or H.W. constituents from the facility have entered the ground-water?			
a. If "No", was the original indicator evaluation program, required by 265.92 and 265.93b, reinstated?			
b. Was the RA notified of the reinstatement of the program within 15 days of the determination (265.93d.6)?			

VII. Ground-Water Monitoring: - Continued  
(Part 265 Subpart F)

Compliance Form For A Facility Which May Be Affecting  
Ground-Water Quality

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
9. If it was determined that H.W. or H.W. constituents have entered the ground-water: (265.93d.7)			
a. For facilities where the program was implemented prior to final closure, are determinations of H.W or H.W. constituents continued on a quarterly basis (265.93d.7)? (If the program was implemented during the post-closure care period, determinations made in accordance with the ground-water quality assessment plan may cease after the first determination.)			Not Evaluated
b. Were subsequent ground-water quality reports submitted to the RA within 15 days of determination (265.93d.7)?			
c. Were records kept of the analysis and evaluations specified in the ground-water quality assessment (throughout the active life of the facility) (265.94b.1)?			
d. If a disposal facility, were (are) records kept throughout the post-closure period as well (265.94b.1)?			
10. Are annual reports submitted to the RA containing the results of the ground-water quality assessment program (265.94b.2)?			
a. Do the reports include the calculated or measured rate of migration of H.W. or H.W. constituents during the reporting period (265.94b.2)?			

DATE.....9/19/86  
CA D008325110  
INSPECTOR.....MO

VII. Ground-Water Monitoring: - Continued  
(Part 265 Subpart F)

DATE 9/19/86

Compliance Form For Demonstrating A Waiver Of  
Interim Status Requirements

0008325110

INSPECTOR MO

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
1. Is a written waiver demonstration kept at the site (265.90c)?	---	---	Not Evaluated
2. Is the demonstration certified by a qualified geologist or geotechnical engineer (265.90c)?	---	---	
3. Does the waiver demonstration establish the potential for migration of H.W. or H.W. constituents from the facility to the uppermost aquifer (265.90c.1)?	---	---	
a. Does the evaluation of a water balance include:			
i. Precipitation?	---	---	
ii. Evapotranspiration?	---	---	
iii. Runoff?	---	---	
iv. Infiltration? (including any liquid in surface impoundments)	---	---	
b. Does the evaluation of the unsaturated zone characteristics include:			
i. Geologic Materials?	---	---	
ii. Physical Properties?	---	---	
iii. Depth to ground-water?	---	---	
4. Does the waiver demonstration establish the potential for H.W. or H.W. constituents which may enter the uppermost aquifer to migrate to a water supply well or surface water (265.90c.2)?	---	---	
a. Does the evaluation of the saturated zone characteristics include?			
i. Geologic materials?	---	---	
ii. Physical properties?	---	---	
iii. Rate of ground-water flow?	---	---	
iv. Proximity of the facility to water supply wells or surface water?	---	---	

VIII. Closure and Post-Closure:  
(Part 265 Subpart G)

Yes No Comments

(A) Closure Plan:

1. Does the facility have a closure plan (265.112a)?  
CAC67212(a)
  2. Does the plan identify the steps necessary to completely or partially close the facility at any point during its intended operating life and to completely close at the end of its intended operating life (265.112a)?  
CAC67212(b)
  3. Do the steps to close in the plan include: (265.112a)  
CAC 67212(b)
    - a. Pre-treatment of H.W.?
    - b. Treatment of H.W.?
    - c. Removal of H.W. from process units?
    - d. Disposal of H.W.?
    - e. Decontamination of equipment and structures?
    - f. Scheduled inspections for closure certification purposes?
  3. Does the description of how and when the facility will be closed include the following elements:
    - a. Maximum extent of operation which will be unclosed during the life of the facility (265.112a.1)?  
CAC 67212(b)(1)  
For facilities that have designated H.W. management areas inactive prior to Nov. 19, 1980, are records available documenting the cessation of activity or final closure?
- Was a Notification of Hazardous Waste Site submitted to EPA as required by § 103c of CERCLA ?

✓ Facility has been certified as closed.  
DATE.....9/19/86  
C. D008325110  
INSPECTOR.....MG

VIII. Closure and Post-Closure: - Continued  
(Part 265 Subpart G)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
b. Estimate of the maximum inventory of H.W. in storage and in treatment at any time during the life of the facility (265.112a.2)?			✓ Facility has been certified as closed
CAC 67212(b)(2)			
c. Does the inventory include the maximum amount of on-site:			
H.W. in surface impoundments?			DATE 9/19/86
H.W. in tanks?			CA D008345110
H.W. in piles?			INSPECTOR MO
H.W. in containers?			
H.W. in drainage pits or sumps?			
Contaminated soil from spills or leaks?			
Contaminated soils and liners from non-disposal impoundments?			
Contaminated soils from land treatment fields?			
Decontamination residues?			
Process residues?			
Other (specify)?			
d. Decontamination procedures including: (265.112a.3)			
CAC 67212(b)(3)			
A list of equipment, containers, structures requiring decontamination?			
Sampling and analytical methods for determining whether soil contamination or decontamination residues are H.W.?			
Testing criteria for determining adequacy of clean-up?			
Methods of treatment or disposal of contaminated soils and residues?			✓

VIII. Closure and Post-Closure: - Continued  
(Part 265 Subpart G)

	Yes	No	Comments
e. Estimate of the expected year of closure (265.112a.4)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Facility has been certified as closed
f. Schedule for final closure activities (265.112a.4)?	<input type="checkbox"/>	<input type="checkbox"/>	
g. Does the schedule include:			
Total time required to close?	<input type="checkbox"/>	<input type="checkbox"/>	
Time required for intervening closure activities? (e.g., Time required for H.W. treatment, disposal, decontamination, and certification inspections.)	<input type="checkbox"/>	<input type="checkbox"/>	
4. Has the facility amended the plan whenever changes in operating practice or process design affect the plan or there is a change in the expected year of closure (265.112b)? (Plan must be amended within 60 days of the changes.)	<input type="checkbox"/>	<input type="checkbox"/>	DATE..... 9/19/96 C: D008325110 INSPECTOR..... M.D.
5. Has the facility submitted a closure plan to the RA at least 180 days before the date they expect to begin closure (265.112c)?	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Time Allowed For Closure:			
1. Does the schedule for final closure allow for the following:			
a. Treatment, removal, or disposal of H.W. within 90 days after receipt of final volume of H.W. or after approval of closure plan (265.113a)?	<input type="checkbox"/>	<input type="checkbox"/>	
b. Completion of closure plan activities within 180 days after receipt of final volume of H.W. or after approval of closure plan (265.113b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

**VIII. Closure and Post-Closure: - Continued**  
**(Part 265 Subpart G)**

Yes	No	Comments
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(C) Disposal And Decontamination Of Equipment:

1. For facilities that have completed closure activities, has all equipment and structures been properly disposed of or decontaminated by removing all H.W. and contaminated residues (265.114)?

✓ Facility has been  
certified as closed

(D) Certification Of Closure:

1. For facilities that have completed closure activities, has a certification by owner/operator and an independent registered professional engineer been submitted to the RA (265.115)?

✓

(E) Partial Closure:

1. Does the facility plan to close discreet regulated H.W. management units during the intended operating life?

V/A — Totally closed

If "Yes" complete compliance form  
for partial closure.

DATE.....9/19/56

C. 0008325110

INSPECTOR.....740

VIII. Closure and Post-Closure: - Continued  
(Part 265 Subpart G)

Compliance Form For Partial Closure

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
<b>(E) Partial Closure:</b>			
1. Does the closure plan describe how the facility will be partially closed (265.112a.1)?			N/A Facility is completely closed
2. Does the plan describe the size of areas partially closed?			
3. Does the plan describe the procedures for partial closure?			
4. Does the plan address maintenance activities, including: (265.112a.1)			
a. Visual inspections?			
b. Ground-water monitoring?			
c. Maintaining cover?			
d. Maintaining diversion structures?			
e. Controlling erosion?			
f. Maintaining vegetation?			
g. Maintaining site security systems?			
h. Leachate collection system?			
i. Gas collection system?			
j. Other (specify)?			
5. Does the plan describe the frequencies for each type of maintenance activity (265.112a.1)?			
6. Does the plan describe when the facility will be partially closed (265.112a.1)?			
7. Does the schedule for partial closure include: (265.112a.1)			
a. Date(s) of partial closure(s)?			
b. Total time required for each partial closure?			
c. Time required for intervening partial closure activities? (e.g., time required for waste removal, stabilization, treatment, disposal; placement of cover; vegetation; decontamination; certification.)			

DATE.....

9/19/96  
CA 0008325110

INSPECTOR.....



VIII. Closure and Post-Closure: - Continued  
(Part 265 Subpart G)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(F) Post-Closure:			
1. Does the facility have a post-closure plan (265.118a)?			<u>No Facility is totally closed</u>
2. Does the plan cover the maximum area expected to contain H.W. after closure, including: (265.118a)			
a. Landfills?			
b. Disposal surface impoundments?			
c. Land treatment facilities where H.W. will remain?			
d. Other remaining H.W. (specify)?			
3. Does the plan cover all areas where H.W. will remain that were active as of Nov. 19, 1980 (265.118a)?			
4. Does the plan provide for 30 years of post-closure care (265.117a)?			
5. Does the plan clearly identify the activities required in post-closure care (265.118a)?			
6. Does the plan clearly identify the frequencies for post-closure care activities (265.118a)?			
7. Does the plan describe ground-water monitoring, including: (265.118a.1)			
a. Number of wells?			
b. Sample collection activities and frequencies?			
c. Sample testing procedures and frequencies?			
d. Replacement of failed wells?			

DATE.....

CA D 008325110

INSPECTOR.....

VIII. Closure and Post-Closure: - Continued  
(Part 265 Subpart G)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
8. Does the plan describe maintenance for waste containment structures, including the types of activities and frequency of activities necessary to maintain: (265.118a.2)			
a. Site security systems?			
b. Surveyed benchmarks?			
c. Facility monitoring systems?			
d. Final cover (erosion damage repair)?			
e. Vegetation (fertilizing and mowing)?			
f. Runoff collection and treatment systems?			
g. Runon control systems?			
h. Leachate collection, removal and treatment systems?			
i. Gas collection and treatment systems?			
j. Other (specify)?			
9. Does the plan identify the name, address and phone number of the post-closure period contact (265.118a.3)?			DATE.....9/19/86
10. Did the facility amend the plan whenever changes in operating practices, or process design, or events which occur during the active life of the facility, affect their post-closure plan? (265.118b)? (Plan must be amended within 60 days after the changes or events occur.)			CA D008325110 INSPECTOR.....MO
11. Did the facility submit their post-closure plan to the RA at least 180 days before they expect to begin closure (265.118c)?			
12. Did the facility amend the plan whenever changes in monitoring or maintenance plans or events which occur during the post-closure care period affect their post-closure plan (265.118e)? (Facility must petition RA to amend plan in accordance with procedures specified in § 265.118f.)			

N/A - Facility is totally closed.

VIII. Closure and Post-Closure: - Continued  
(Part 265 Subpart G)

Yes   No   Comments

(G) Notice To Local Land Authority:

1. For disposal facilities, were the following documents submitted to the RA and local land authority within 90 days after closure was completed: (265.119)

CAC 67219

- a. A survey plat indicating the locations and dimensions of landfill cells or other disposal areas with respect to permanently surveyed benchmarks?
- b. A record of the type, location, and quantity of H.W. disposed of within each cell or area of the facility?
- c. A record of the type, location, and quantity of the wastes disposed of before Nov. 19, 1980?

*NA Facility is totally closed  
see closure report.*

(H) Notice In Deed To Property:

1. For disposal facilities, did the owner of the property record in the deed a notation that will in perpetuity notify any potential purchaser of the property that the land was used to manage H.W. and its use is restricted under § 265.117c (265.120)?

CAC 67220(a)

DATE.....

CA D008325110

INSPECTOR.....

IX. Financial Requirements:  
(Part 265 Subpart H)

DATE 9/19/86

CA D008325110

INSPECTOR MO

Yes No Comments

(A) Cost Estimate For Closure:

1. Has a written estimate been prepared of the cost of closing the facility (265.142a)?

CAC 672002(a)

What is the amount of the closure cost estimate? \$

2. Does the estimate equal the cost of closure at the point when the extent and manner of the operation would make closure the most expensive (265.142a)?

CAC 672002(a)

3. Does the cost estimate cover all the activities in the closure plan (265.142a)?

CAC 67002 (a)

4. Has the cost estimate been adjusted for inflation within 30 days after each anniversary of the date on which the first cost estimate was prepared (265.142b)?

CAC 67002(b)

5. Was the adjustment made by using an inflation factor derived from the Annual Implicit Price Deflator for Gross National Product as published by the U.S. Dept. of Commerce in its "Survey of Current Business" (265.142b)?

CAC67002 (b)

Latest Annual Deflator =

Previous Annual Deflator =

Inflation Factor = (latest deflator/previous deflator)

Current Cost Adjustment = \$ (latest adjusted estimate x inflation factor)

DATE..... 9/19/86  
CA D008325110  
INSPECTOR..... 7MO.

CA 0008325110

INSPECTOR

6. Was the cost estimate revised whenever a change in the closure plan increased the cost of closure (265.142c)?  
(Revised estimate must be adjusted for inflation.)  
CAC 67002(c)
7. Are the following kept at the facility during the operating life of the facility: (265.142d)  
CAC 67002(d)
  - a. Latest closure cost estimate?
  - b. Latest adjusted closure cost estimate?
8. Is there written documentation supporting the closure cost estimate?
  - a. Workups from labor, material and equipment requirements?
  - b. Contractor estimates and bids?
  - c. Figures derived from cost estimating handbooks?
  - d. Figures derived from operator experience?
9. Does the estimate accurately reflect the cost of closure for similar types of facilities?

N/A Facility is completed  
closed

IX. Financial Requirements: - Continued  
(Part 265 Subpart H)

DATE 9/19/86

008325110

INSPECTOR MO

Yes No Comments

(B) Cost Estimate For Post-Closure Care:

1. Has a written estimate been prepared of the annual cost of post-closure monitoring and maintenance of the facility (265.144a)?  
CAC 67014 (a)

N/A Facility is completely closed

What is the amount of the post-closure cost estimate? \$ \_\_\_\_\_

2. Is the annual estimate multiplied by 30 to cover the entire post-closure care period (265.144a)?  
CAC 67014(a)

\_\_\_\_\_

3. Does the cost estimate cover all activities in the post-closure plan (265.144a)?

\_\_\_\_\_

4. Has the cost estimate been adjusted for inflation within 30 days after each anniversary of the date on which the first cost estimate was prepared (265.144b)?  
CAC 67014 (b)

\_\_\_\_\_

5. Was the adjustment made by using an inflation factor derived from the annual Implicit Price Deflator for Gross National Product as published by the U.S. Dept. of Commerce in its "Survey of Current Business" (265.144b)?

\_\_\_\_\_

CAC 67014(b)

Latest Annual Deflator = \_\_\_\_\_

Previous Annual Deflator = \_\_\_\_\_

Inflation Factor = \_\_\_\_\_ (Latest Deflator/Previous Deflator)

Annual Cost Adjustment = \$ \_\_\_\_\_ (Latest Adjusted Estimate x Inflation Factor)

Post-Closure Cost Estimate = \$ \_\_\_\_\_ (Annual Cost Adjustment x 30)

IX. Financial Requirements: - Continued  
(Part 265 Subpart H)

DATE

9/19/86

DA D0083-5110

Yes No Comments

INSPECTOR

6. Was the cost estimate revised whenever a change in the post-closure plan increased the cost of post-closure (265.144c)?

(Revised estimate must be adjusted for inflation.)  
CAC 67014(c)

NA

Facility is completely closed.

7. Are the following kept at the facility during the operating life of the facility: (265.144d)  
CAC 67014(d)

a. Latest post-closure cost estimate?

b. Latest adjusted post-closure cost estimate?

8. Is there written documentation supporting the post-closure cost estimate?

a. Workups for labor, material and equipment requirements?

b. Contractor estimates and bids?

c. Figures derived from cost estimating handbooks?

d. Figures derived from operator experience?

9. Does the estimate accurately reflect the cost of post-closure for similar types of facilities?

X. Use And Management Of Containers:  
(Part 265 Subpart I)

DATE 9/19/86

Yes No Comments C: 1008-25110

INSPECTOR MO

1. Does the facility transfer H.W. from containers not in good condition or leaking to containers in good condition (265.171)?  
CAC 67241
2. Are containers compatible with H.W. stored in them (265.172)?  
CAC 67242
3. Are containers stored closed (265.173a)?  
CAC 67243 (a)
4. Are containers managed to prevent rupture or leakage (265.173b)?  
CAC 67243(b)
5. Are containers inspected weekly for leaks and deterioration (265.174)?  
CAC 67244
6. Are ignitable or reactive wastes stored at least 50 feet from the facility's property line (265.176)?  
CAC 67246
7. Are incompatible wastes stored in separate containers (265.177a)?  
CAC 67247(a)
8. Are H.W. not placed in unwashed containers that previously held an incompatible waste or material (265.177b)?  
CAC 67247(b)
9. Are containers holding a H.W. that is incompatible with any waste or materials stored nearby in other containers, piles, open tanks, or surface impoundments separated from the incompatibles by sufficient distance or protected by means of a dike, berm, wall, or other device (265.177c)?  
CAC 67247(c)
10. Are containers that are not empty managed as a H.W. (261.7a.2)?
11. For a container to be considered empty the facility must ensure that:
  - a. No more than one inch of residue remains on bottom of container or inner lining (261.7b.1)?
  - b. Containers that held an acutely H.W. are tripled rinsed using a solvent capable of removing the contents (261.7b.3)?

NA Facility is no longer in operation.



**XI. Tanks:**  
(Part 265 Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
1. Is the treatment or storage of H.W. in tanks conducted so that it does not: (265.192a)			DATE <u>9/19/86</u>
a. Generate extreme heat or pressure: fire or explosion; or violent reaction?			C: 0008325110 N/A - Facility is no longer in operation
b. Produce uncontrolled toxic or flammable mists, fumes, dusts, or gases?			
c. Damage the structural integrity of the tank?			
2. Are H.W. or treatment reagents placed in a tank so that they do not cause the tank or its inner liner to rupture, leak, corrode, or otherwise fail (265.192b)?			
CAC 67252(c) & CAC 67257(b)			
3. Do uncovered tanks have at least 2 feet of freeboard, or dikes, or other containment features (265.192c)?			
CAC 67252(b)(2) & CAC 67257(c)			
4. Where H.W. is continuously fed into a tank, is the tank equipped with a waste feed cutoff system or by-pass system to a stand-by tank (265.192d)?			
CAC 67257(d)			
5. Does the facility conduct waste analysis and trial treatment or storage tests, or have they obtained written documentation on similar storage or treatment of similar waste under similar operating conditions before the tank is used to:			
a. Chemically treat or store a H.W. which is substantially different from waste previously treated or stored in the tank (265.193a.1)?			
CAC 67258 (a)(1)			
b. Chemically treat H.W. with a substantially different process than was previously used (265.193a.2)?			
CAC 67258 (a)(2)			

XI. Tanks: - Continued  
(Part 265 Subpart J)

	Yes	No	Comments	DATE
6. Are daily and weekly inspections done for the following: CAC 67259				9/19/86
a. Discharge control equipment e.g., feed cutoff, bypass and drainage systems (Daily) (265.194a.1)?			N/A	
b. Data gathered from monitoring equipment e.g., pressure and temperature gauges (Daily) (265.194a.2)?			Facility is no longer in operation.	
c. Level of waste in uncovered tanks (Daily) (265.194a.3)?				
d. Construction materials of tank e.g., corrosion, leaking fixtures or seams (Weekly) (265.194a.4)?				
e. Discharge confinement structures e.g., dikes (Weekly) (265.194a.5)?				
7. At closure, are all H.W. and residues removed from tanks and associated equipment and structures (265.197)? CAC 67260				
8. Are ignitable or reactive waste treated, rendered, or mixed before or immediately after placement in a tank so that the resulting waste no longer meets the definition of ignitability or reactivity (265.198a.1)? or CAC 67261 (a)(1)				
9. Are ignitable or reactive waste stored or treated in such a way that it is protected from conditions which may cause the waste to ignite or react (265.198a.2)? CAC 67261(a)(2)				
10. Does the facility comply with the buffer zone requirements for covered tanks containing ignitable or reactive wastes specified in tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1977 or 1981) (265.198b)? CAC 67261(b)				
11. Are incompatible wastes stored in separate tanks (265.199a)? CAC 67262(a)				
12. Are H.W. not placed in unwashed tanks that previously held an incompatible waste or material (265.199b)? CAC 67262 (b)				

**XII. Surface Impoundments:**  
(Part 265 Subpart K)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
1. Do impoundments have at least 2 feet of freeboard (265.222)?	___	___	Not Evaluated
2. Do earthen dikes have protective cover to minimize wind and water erosion and to preserve their structural integrity (265.223)?	___	___	
3. Does the facility conduct waste analysis and trial treatment tests, or have they obtained written documentation on similar treatment of similar waste under similar operating conditions before the impoundment is is used to:	___	___	<div style="text-align: right;">           DATE..... 9/19/66            CA D008325110            INSPECTOR..... MO         </div>
a. Chemically treat a H.W. which is substantially different from waste previously treated in the impoundment (265.225a.1)?	___	___	
b. Chemically treat H.W. with a substantially different process than was previously used (265.225a.2)?	___	___	
4. Is the treatment of H.W. in impoundments conducted so that it does not: (265.225a.2)	___	___	
a. Generate extreme heat or pressure; fire or explosion; or violent reaction?	___	___	
b. Produce uncontrolled toxic or flammable mists, fumes, dusts, or gases?	___	___	
c. Damage the structural integrity of the liner?	___	___	
d. Threaten human health or the environment?	___	___	
5. Is the freeboard level inspected at least daily (265.226a.1)?	___	___	
6. Are the dikes inspected weekly for evidence of leaks, deterioration or failure (265.226a.2)?	___	___	

**XII. Surface Impoundments: - Continued**  
(Part 265 Subpart K)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
7. At closure, has the facility removed from the impoundments: (265.228a)			
a. Standing liquids?	---	---	Not Evaluated
b. Waste and waste residues?	---	---	
c. The liner, if any?	---	---	
d. Underlying and surrounding contaminated soil?	---	---	
8. At closure, has the facility demonstrated under § 261.3 c & d that none of the materials listed in (7) remaining at any stage of removal are H.W. (265.228b)?	---	---	
9. If the answers to (7) & (8) are no, has the facility closed the impoundment and provided post-closure care as a landfill (265.228c)?	---	---	
10. Is an ignitable or reactive waste treated, or mixed before or immediately after placement in an impoundment so that the resulting waste no longer meets the definition of ignitability or reactivity (265.229a.1)?	---	---	
11. Does the facility take precautions to ensure that incompatible wastes and materials are not placed in the same impoundment (265.230)?	---	---	

DATE.....9/19/86  
CA D008325110  
INSPECTOR.....MCO

**XIII. Waste Piles:**  
(Part 265 Subpart L)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
1. Are waste piles covered or protected from dispersal by wind (265.251)?	_____	_____	Not Evaluated
2. Is a representative sample of waste from each incoming movement analyzed to determine its compatibility with other waste in the pile (265.252)?	_____	_____	
3. For waste piles where the leachate or run-off from the pile is a H.W.:			
a. Is the pile placed on an impermeable base that is compatible with the waste; run-on is diverted away from the pile; leachate and run-off is collected and managed as a H.W. (265.253a)? -or-	_____	_____	DATE..... 9/19/86
b. The pile is protected from precipitation and run-on (265.253b.1)? -and-	_____	_____	CA D008325110
c. No liquids or wastes containing free liquids are placed in the pile (265.253b.2)?	_____	_____	INSPECTOR..... MO
4. For facilities that add ignitable or reactive wastes to an existing pile, can the following be demonstrated:			
a. The resulting waste mixture no longer meets the definition of ignitable or reactive waste and the mixing will not cause an uncontrolled reaction (265.256a.1)?	_____	_____	
b. The waste is protected from materials or conditions that might cause them to ignite or react (265.256a.2)?	_____	_____	
5. Does the facility take precautions to ensure that incompatible wastes and materials are not placed in the same waste pile (265.257a)?	_____	_____	
6. Are piles of H.W. that are incompatible with materials stored nearby separated by sufficient distance or protected by some structural device e.g., dike, wall or berm (265.257b)?	_____	_____	
7. Are H.W. not placed on the same area where incompatible wastes were previously piled (265.257c)?	_____	_____	

**XIV. Land Treatment:**  
(Part 265 Subpart M)

Yes   No   Comments

**(A) General Operating Requirements:**

1. Is treated H.W. capable of biological or chemical degradation (265.272a)?

Not Evaluated

List H.W. placed in land treatment unit.

2. Is run-on control system designed, constructed, operated, and maintained to keep flow off the active portions of the facility during peak discharge from at least a 25-year storm (265.272b)?

DATE.....9/19/86

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INSPECTOR.....*[Signature]*

3. Is run-off management system designed, constructed, operated, and maintained to collect and control water volume at least equivalent to a 24-hour, 25-year storm (265.272c)?

4. Are collection and holding facilities associated with run-on and run-off control systems managed to maintain design capacity of system (265.272d)?

5. Is the treatment zone managed to control wind dispersal (265.272e)?

**(B) Waste Analysis:**

1. Before placing H.W. in or on a land treatment unit, has the facility determined the following:

- a. Concentrations in the waste of any substance that cause a waste to exhibit the EP toxicity characteristic (265.273a)?

- b. For any waste listed in Part 261, Subpart D, the concentration of any substance which caused the waste to be listed as a H.W. (265.273b)?

- c. If food chain crops are grown, the concentrations in the waste of As, Cd, Pb, & Hg, unless written, documented data shows that the constituent is not present (265.273c)?

XIV. Land Treatment: - C used  
(Part 265 Subpart M)

Yes No Comments DATE 9/19/96

(C) Unsaturated Zone Monitoring:

008325110

Yes	No	Comments	DATE
		Does the facility have an unsaturated zone monitoring plan (265.278a)?	9/19/96
		Has the facility implemented the plan (265.278a)?	
		Is the plan designed to detect vertical migration of H.W. and H.W constituents under active portions of the land treatment unit (265.278a.1)?	
		Is the plan designed to provide information on the background concentrations of H.W. and H.W. constituents in similar but untreated soils nearby (265.278a.2)?	
		Is background monitoring conducted before or in conjunction with monitoring required in 265.278a.1 (265.278a.2)?	
		Does the plan include, at a minimum:	
		a. Soil-monitoring using soil cores (265.278b.1)?	
		b. Soil-pore water monitoring using devices such as lysimeters (265.278b.2)?	
		Has the facility demonstrated the following in their plan:	
		a. The depth at which soil and soil-pore water samples are to be taken is below the depth to which the waste is incorporated into the soil (265.278c.1)?	
		b. The number of soil and soil-pore water samples to be taken is based on the variability of the H.W. constituents in the waste and the soil type(s) (265.278c.2)?	
		c. The frequency and timing of soil and soil-pore water sampling is based on the frequency, time, and rate of waste application, proximity to ground-water, and soil permeability (265.278c.3)?	

XIV. Land Treatment: - Continued  
(Part 265 Subpart M)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>	<u>DATE</u>
8. Is the plan and the rationale used in developing this plan kept at the facility (265.278d)?	---	---	Not Evaluated	9/19/90
9. Does the facility analyze the soil and soil-pore water samples for the H.W. constituents that were found in the waste during the waste analysis (265.278e)?	---	---		
(D) Recordkeeping:				
1. Are records kept regarding application dates and rates, quantities, and locations of all H.W. placed in the land treatment unit (265.279)?	---	---		
(E) Closure and Post-Closure:				
1. Does the closure plan and post-closure plan address the following objectives and indicate how they will be achieved:				
a. Control of migration of H.W. and H.W. constituents from the treatment zone into the ground-water (265.280a.1)?	---	---		
b. Control of the release of contaminated run-off from the unit into surface water (265.280a.2)?	---	---		
c. Control of the release of airborne particulate contaminants caused by wind erosion (265.280a.3)?	---	---		
d. Compliance with 265.276 (growth of food chain crops) (265.280a.4)?	---	---		
2. Were the following factors considered in addressing the closure and post-closure care objectives:				
a. Type and amount of H.W. and H.W. constituents applied to the land treatment unit (265.280b.1)?	---	---		
b. Mobility and expected rate of migration of H.W. and H.W. constituents (265.280b.2)?	---	---		



**XIV. Land Treatment: - Continued**  
(Part 265 Subpart M)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
c. Site location, topography, and surrounding land use with respect to the potential effects of pollutant migration (e.g., proximity to ground water, surface water and drinking water sources) (265.280b.3)?	___	___	
d. Climate, including amount, frequency & pH of precipitation (265.280b.4)?	___	___	
e. Geological and soil profiles; surface & subsurface hydrology of the site; soil characteristics, including cation exchange capacity, total organic carbon, and pH (265.280b.5)?	___	___	
f. Unsaturated zone monitoring information (265.280b.6)?	___	___	
g. Type, concentration, and depth of migration of H.W. constituents in the soil as compared to their background concentrations (265.280b.7)?	___	___	
3. Were the following methods considered in addressing the closure and post-closure care objectives:			
a. Removal of contaminated soil (265.280c.1)?	___	___	
b. Placement of final cover, considering: (265.280c.2)			
Functions of cover (e.g., infiltration control, erosion and run-off control, and wind erosion control)?	___	___	
Characteristics of the cover, including material, final surface contours, thickness, porosity and permeability, slope, length of run of slope and type of vegetation on the cover?	___	___	
4. Does the closure plan provide for the following during the closure period:			
a. Continuation of the unsaturated zone monitoring program (soil-pore liquid monitoring may be terminated 90 days after last application of waste (265.280d.1)?	___	___	

DATE 9/19/86  
C' 0008325110  
INS P Not Evaluated

XIV. Land Treatment: - Continued  
(Part 265 Subpart M)

DATE 7/19/86

	Yes	No	Comments
b. Maintenance of run-on control system (265.280d.2)?			Not Evaluated INSPECTOR
c. Maintenance of run-off management system (265.280d.3)?			
d. Controlling wind dispersal of H.W. (265.280d.4)?			
e. Closure certification by both owner or operator and an independent qualified soil scientist (265.280e)?			
5. Does the post-closure plan provide for the following during the post-closure care period:			
a. Continuation of the soil-core monitoring program (265.280f.1)?			
b. Restriction of access to the unit as appropriate (265.280f.2)?			
c. Assurance of compliance with 265.276 (food chain crops) (265.280f.3)?			
d. Controlling wind dispersal of H.W. (265.280f.4)?			
(F) Requirements For Ignitable Or Reactive Waste:			
1. Are ignitable or reactive wastes immediately incorporated into the soil so that either:			
a. The resulting waste mixture no longer meets the definition of ignitable or reactive waste (265.281a.1); and Section 265.17b is complied with (265.281a.2)? or			
b. The waste is managed in such a way that it is protected from conditions which may cause it to ignite or react (265.281b)?			
(G) Requirements For Incompatible Wastes:			
1. Does the facility ensure that incompatible wastes are not placed in the same unit (265.282)?			

XV. Landfills:  
(Part 265 Subpart N)

DATE.....9/19/86

C: D008325110

INSPECTOR.....MO

(A) General Operating Requirements:

1. Is the run-on control system capable of preventing flow onto active portions during peak discharge from a 25-year storm (265.302a)?

Not Evaluated

2. Is the run-off management system capable of collecting and controlling the water volume resulting from a 24-hour, 25-year storm (265.302b)?

3. After storms are the run-on and run-off control systems returned to their design capacities (265.302c)?

4. Are H.W. managed to prevent wind dispersal (265.302d)?

3) Surveying And Recordkeeping:

1. Does the facility maintain the following items in the operating record:

- a. On a map, the exact location, dimensions and depth of each cell with respect to permanently surveyed benchmarks (265.309a)?

- b. The contents of each cell and the location of each H.W. type within each cell (265.309b)?

(C) Closure and Post-Closure:

1. Has a final cover been placed over the landfill and does the closure plan specify the function and design of the final cover (265.310a)?

XV. Landfills: - Continued  
(Part 265 Subpart N)

	Yes	No	Comments
2. Does the closure and post-closure plans address the following objectives and indicate how they will be achieved: (265.310b)			DATE.....9/19/86
a. Control of pollutant migration from the facility via ground-water, surface water, and air (265.310b.1)?			CA D008325110 IN P CT R..... Not Evaluated
b. Control of surface water infiltration including prevention of pooling (265.310b.2)?			
c. Prevention of erosion (265.310b.3)?			
3. Are the following factors addressed with respect to the objectives stated in § 265.310b:			
a. Type and amount of H.W. and H.W. constituents in the landfill (265.310c.1)?			
b. The mobility and expected rate of migration of H.W. and H.W. constituents (265.310c.2)?			
c. Site location, topography, and surrounding land use, with respect to the potential effects of pollutant migration (e.g., proximity to ground-water, surface water, and drinking water sources.) (265.310c.3)?			
d. Climate, including amount, frequency, and pH of precipitation (265.310c.4)?			
e. Characteristics of the cover including type of material, source, final surface contours, thickness, porosity, permeability, slope, length of run of slope, and type of vegetation on the cover (265.310c.5)?			
f. Geological and soil profiles and surface and subsurface hydrology of the site (265.310c.6)?			

XV. Landfills: - Continued  
(Part 265 Subpart N)

DATE 9/19/96

CA 0008345110

INSPECTOR MO

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
4. During the post-closure care period does the facility:			
a. Maintain the function and integrity of the final cover (265.310d.1)?	---	---	Not Evaluated
b. Maintain and monitor the leachate collection, removal, and treatment system to prevent excess accumulation of leachate in the system (265.310d.2)?	---	---	
c. Maintain and monitor the gas collection system to control the vertical and horizontal escape of gases (265.310d.3)?	---	---	
d. Protect and maintain surveyed benchmarks (265.310d.4)?	---	---	
e. Restrict access to the landfill (265.310d.5)?	---	---	
(D) Requirements For Ignitable Or Reactive Wastes:			
1. Are ignitable or reactive wastes treated, rendered, or mixed before or immediately after placement in the landfill so that the resulting waste mixture does not:			
a. Exhibit the characteristics of ignitability or reactivity (265.312a.1)?	---	---	
b. Generate extreme heat or pressure, fire or explosion, or violent reaction; produce uncontrolled toxic or flammable air emissions; damage the liner; threaten human health and the environment (265.312a.2)?	---	---	

XV. Landfills: - Continued  
(Part 265 Subpart N)

DATE 9/19/86

C# D008325110

INSPECTOR MO

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
<b>(E) Requirements For Ignitable Wastes Disposed Of In Containers: (265.312b)</b>			
1. Are wastes protected from materials or conditions which may cause them to ignite?	___	___	Not Evaluated
2. Are wastes disposed of in non-leaking containers?	___	___	
3. Are wastes carefully handled and placed so as to avoid heat or sparks?	___	___	
4. Are wastes covered daily with soil?	___	___	
5. Are wastes disposed in cells that do not contain other wastes which may generate heat and cause ignition?	___	___	
<b>(F) Requirements For Incompatible Wastes:</b>			
1. Are incompatible wastes and materials not placed in the same landfill cell (265.313)?	___	___	
<b>(G) Requirements For Liquid Wastes:</b>			
1. For facilities that accept bulk liquid waste or waste containing free liquids, are the following requirements met:			
a. The landfill has a liner and leachate collection and removal system as specified in § 264.301a (265.314a.1)?	___	___	
b. Before disposal, the liquids are treated or stabilized, chemically or physically, so that free liquids are no longer present (265.314a.2)?	___	___	
2. For facilities that accept liquids in containers, are the following requirements met prior to disposal:			
a. All free-standing liquid is removed by decanting (265.314b.1)?	___	___	

XV. Landfills: - Continued  
(Part 265 Subpart N)

DATE 9/19/86

CA 0008325110

INSPECTOR MMO

Not Evaluated

- b. All free-standing liquid is eliminated by mixing with absorbent or solidification (265.314b.1)?

[containers that are very small (ampules); are designed to hold free liquids (batteries); or are lab packs are not subject to these restrictions]

(H) Requirements For Containers:

1. Are empty containers crushed flat, shredded, or similarly reduced in volume before they are buried in the landfill (265.315a)?

(I) Requirements For Disposal Of Lab Packs In Overpacked Drums:

1. Do lab packs placed in the landfill meet the following requirements: (265.316)

- a. Lab packs are non-leaking?
- b. Lab packs are compatible with waste?
- c. Lab packs are securely sealed?
- d. Lab packs comply with DOT specs?
- e. Lab packs are overpacked in open head DOT spec drum 110 G or less?
- f. Sufficient quantity of absorbent material has been placed in drum to completely absorb all liquid contents of lab packs?
- g. Drum is full after packing with lab packs and absorbent?
- h. Absorbent material is compatible with waste?
- i. Incompatible wastes are not placed in same drum?
- j. Reactive wastes, other than cyanide- or sulfide-bearing wastes are treated or rendered non-reactive prior to placement in lab packs?

Inspection Checklist for HSWA Requirements

Loss of Interim Status (\$270.73)

DATE.....

C. 0008325110

INSPECTION

YES

NO

Not Evaluated

1. Does the facility have any RCRA units that were subject to the loss of Interim Status provision of HSWA? (MAJOR FACILITIES)

2. Did any of the affected RCRA units lose Interim Status on 11/8/85?

3. If so, are any of those units still accepting RCRA hazardous waste?

4. Which ones?

5. If the facility has ceased accepting hazardous waste, what was the last date on which RCRA hazardous waste was placed in such unit(s)?

6. Are any of the RCRA units now accepting waste that is non-hazardous or regulated only by the State?



FY 85 COMPLIANCE MONITORING AND ENFORCEMENT LOG

INSPECTOR: OSBORNE, M.

1. EPA ID: CA0008385110

3. RCRA FACILITY: ☒

4. FACILITY:

☐ Major TSD ☒ Generator  
☒ Non-Major TSD ☐ Trans  
☐ Other

2. HANDLER NAME: TRENT TUBE

5. DATE OF INITIAL EVALUATION WHICH IS  
THE BASIS FOR THIS REPORT: 9/19/86

5a. RESPONSIBLE AGENCY: S = State (DHS / SWRCB)  
B = Contractor/State (County)

6. TYPE OF EVALUATION COVERED  
BY THIS REPORT:  
(circle all that apply)

① = Evaluation Inspection (annual/ISD) 6 = Citizen Complaint  
2 = Sampling inspection 7 = Part B Call In  
3 = Record Review 8 = Withdrawal Candidate  
4 = Ground Water Monitoring Evaluation 9 = Closed Facility  
5 = Follow Up 0 = General  
A = Meetings

7. DATE OF EVALUATION COVERED BY  
THIS REPORT (enter only if different from 5): 1/1/

8. VIOLATIONS:

Class of violation	Area of Violation						
	GWM	CL/PC	Fin. Res	Pt. B	Cmpl. Sch	Manifest	Other
I		1-0 9-0					1-0 9-0
II		1-0 9-0					1-0 9-0

Comments

closure was  
certified and  
approved in  
April of 1985

9. ENFORCEMENT ACTIONS:

Class	Area of Violation	Type (use code)	Date Action Taken	Compliance Dates		Penalty		Agcy (code)
				Scheduled	Actual	Assessed	Collected	

Comments:



**Calocerinos & Spina**  
**CONSULTING ENGINEERS**

1020 Seventh North Street, Liverpool, NY 13088 • (315) 457-8711

December 13, 1984

Mr. Angelo Bellomo  
Regional Administrator  
Toxic Substances Control Division  
Department of Health Services  
107 South Broadway, Room 7128  
Los Angeles, California 90012

Re: Closure Certification  
Trent Tube Facility  
Fullerton, California  
CAD 008325110

Dear Sir:

On August 16, 1984, Mr. Richard Klippel, P.E., of Calocerinos & Spina, Consulting Engineers, inspected the vacant Trent Tube Division Plant at 2100 East Orangethorpe Avenue, Fullerton, California.


Based on his inspection of the physical facilities, as well as photographs, manifests and billing records, we hereby certify that the Facility has been closed in accordance with the "Closure Plan" submitted by Trent Tube Division to your office on April 1, 1984.

The closure activities also included removal of the top three (3) feet of oil-contaminated soil on the two (2) areas on the south side of the Plant which were referenced in Mr. James Anderson's memo to you of May 4, 1984.

We therefore request that you delete the Interim Status Permit for this Facility from your records.

For:

TRENT TUBE DIVISION  
CRUCIBLE MATERIALS CORP.

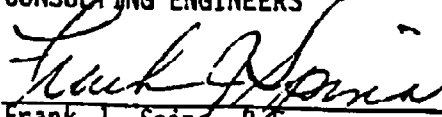
  
D. R. Gehr  
Vice President  
Technical Services

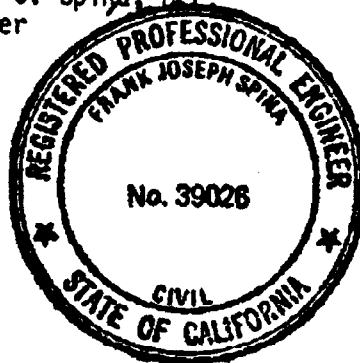
CC: Mr. James Anderson  
Executive Officer  
Regional Water Quality Board  
Suite 200, 6809 Indiana Street  
Riverside, California 92506

Mr. Harry Murphy, Trent Tube Div.

For:

CALOCERINOS & SPINA  
CONSULTING ENGINEERS

  
Frank J. Spina, P.E.  
Partner



C&S OFFICES: SYRACUSE • ATLANTA • PITTSBURGH • BUFFALO

MWNA-WZI 116544

## DEPARTMENT OF HEALTH SERVICES

107 SOUTH BROADWAY, ROOM 7011  
LOS ANGELES, CA 90012



April 16, 1985

Mr. Robert M. Phillips  
Trent Tube Division  
2188 South Church Street  
East Troy, WI 53120

Dear Mr. Phillips:

CERTIFICATION OF CLOSURE, TRENT TUBE FULLERTON FACILITY (CAD 008325110)

This letter is to acknowledge receipt of the Professional Engineer's Certification of Closure transmitted by Calocerinos Espina, dated March 11, 1985. The Department considers the facility closed.

Please be advised that this acknowledgement of facility closure is not a certification that your facility does not pose any environmental or public health threat nor does it remove any liability associated with past hazardous waste management practices at the site.

If you have any questions or comments, please contact Harry Sneh (213) 620-2380.

Sincerely,

John A. Hinton, P.E., Chief  
Facility Permitting Unit  
Southern California Section  
Toxic Substances Control Division

cc: U.S. Environmental  
Protection Agency  
215 Fremont Street  
San Francisco, CA 94105

Robert Holub  
Regional Water Quality  
Control Board  
Santa Ana Region  
6809 Indiana Ave., Suite 200  
Riverside, CA 92506

John Masterman  
Program Management Section  
714 P Street  
Sacramento, CA 95814

## DEPARTMENT OF HEALTH SERVICES

107 SOUTH BROADWAY, ROOM 7128  
LOS ANGELES, CA 90012  
(213) 620-2380

EUKMEJIAN, Governor



## NOTICE OF VIOLATION AND DIRECTIVE TO COMPLY

Identification No: CAD008325110

Date: April 10, 1984  
Facility: TRENT TUBE  
Address: 2100 EAST ORANGETHORPE  
FULLERTON, CA 92634

On the above date an inspection of your facility was conducted under authority of Section 25185, California Health and Safety Code. You are hereby directed to comply with the following:

- (1) SUBMIT WRITTEN INSPECTION SCHEDULE BY  
MAY <sup>31 MNR</sup> 1984 (SECTION III - 5(6)(1))
- (2) CLEAN UP OILY AND SOLVENT WASTES ON GRAVEL  
MATERIAL NEAR SOLVENT (VIRGIN) STORAGE AREA  
AND TANK STORAGE AREA FOR HAZARDOUS WASTES  
BY MAY 31, 1984.  
MNR

NOTE: FACILITY IS CLOSING 6/1/84.

Received By:

Harry L. Murphy

Title

Manager of Liability Insurance  
4/10/84

Authorized State Agent

Name: Maxine RicheySignature: Maxine RicheyDate: 4/10/84

Facility Name: TRENT TUBE

4/10/84

Page 1 of 5

Refer to: ISD	40 CFR	ISD CHECKLIST: OFFICE REVIEW OF DOCUMENTS AND RECORDS	Compliance:			
			Yes	No	N/A	Cmt #
	Page					
I (2)	1	Is there a copy of the Interim Status Document at the facility?	✓			
		OPERATION PLAN				
(3)	2	After receiving written notice has the operator submitted an Operation Plan?	✓			
		PART A APPLICATION AND STATE QUESTIONNAIRE REVIEWED: PROHIBITED ACTS				
	2	The owner or operator shall not do any of the following acts:				
I (4) (a)	"	Treat, store or dispose of hazardous wastes which are not identified			✓	
(4) (b)	"	Employ processes not described in the Part A application			✓	
(4) (c)	"	Make substantial modifications or additions to the facility			✓	
		OPERATING RECORD				
IV 1(a)	265.73(a) P.20	Does the owner/operator maintain a written operating record at the facility?	✓			
		Does the operating record contain:	✓			
1(b) (1)	265.73(b) (1)	A description and quantity of each hazardous waste received, method and date of TSD.	✓			
1(b) (2)	265.73(b) (2)	Location of each waste and quantity at each location with cross-referencing to specific manifest document numbers.	✓			
1(b) (3)	265.73(b) (3)	Waste analyses and trial tests as specified in 265.13, 265.225, 265.252, 265.273, 265.341, 265.375 and 265.402.	✓			
1(b) (4)	265.73(b) (4)	Reports and details of incidents that required implementing the contingency plan as specified in 265.56(j)	✓			
1(b) (5)	265.73(b) (5)	Inspection results and records retained 3 years as specified in 265.15(d), 265.174 and 265.194	✓			
1(b) (6)	265.73(b) (6)	Monitoring, testing and analytical data where required by 265.90, 265.94, 265.276, 265.78, 265.280(d) (1), 265.347 & 265.377	✓			

MWNA-WZI 116547

Facility Name: TRENT TUBE

Page 2 of 5

Refer to:			Compliance:			
ISD	40 CFR		Yes	No	N/A	Cmt #
		STORAGE OF WASTES				
II(1)(a)	P.3	Is hazardous waste stored at the facility for more than one year without written approval from SDOHS?			✓	
(1)(b)		If hazardous waste is stored at the facility for more than one year, has the owner/operator paid fees?			✓	
		GENERATORS USE OF THE MANIFEST				
	Generator					
	262.20	Manifests are completed for all waste transported off-site	✓			
	262.21	The following is on all manifests:				
	262.21(2)	Name, mailing address, phone #, EPA ID# of Generator	✓			
	262.21(3)	Name, EPA ID# of Transporter(s)	✓			
	262.21(4)	Name, address, EPA ID# of designated/alternative facility	✓			
	262.21(5)	DOT Description of waste(s)	✓			
	262.21(6)	Total quantity of waste(s) and type/# of containers	✓			
	262.23	Required signatures	✓			
	262.22	Copies of manifests are available for review	✓			
	262.42(a)	Status of TSD facility copy determined if not returned in 35 days	✓			
	262.42(b)	Exception reports submitted to DOHS within 45 days	✓			
		OFF SITE FACILITIES USE OF THE MANIFEST				
	265.71	Are all applicable sections signed and dated certifying the waste was received?	✓			
		Are discrepancies note on the manifests?	✓			
		Does the facility send/give copies of the manifest to the generator, transporter and DOHS?	✓			

MWNA-WZI 116548

Facility Name: TRANT TUBE

Page 3 of 5

Refer to: ISD	40 CFR		Compliance:			
			Yes	No	N/A	Cmt #
		Are manifest records retained at the facility for atleast 3 years?	✓			
	265.72	Are manifest discrepancies resolved within 15 days or	✓			
		if not are such discrepancies referred to DOHS?				
	265.76	Does the facility submit a report within 15 days for all unmani- fested wastes received?	✓			
		MANAGEMENT OF EXTREMELY HAZARDOUS WASTE				
*		Does the operator handle extremely hazardous waste under an Extremely Hazardous Waste Disposal Permit?	✓			
		WASTE ANALYSIS				
III-3(a)	265.13(a)	Does owner/operator analyze waste prior to treating, storing, or disposing of waste? (Existing published or documented data may be substituted for chemical analyses).	✓			
III-3(b)	265.13(b)	Does owner/operator have a written Waste Analysis Plan?	✓			
3(b)(1)	265.13(b)	Does plan specify parameters and a rationale for selecting these parameters?	✓			
3(b)(2)	265.13(b)	Does plan specify test methods used?	✓			
3(b)(3)	265.13(b)	Does plan specify sampling methods to be used? (Sampling method should be able to produce a representative sample).	✓			
3(b)(4)	265.13(b)	Does plan specify the frequency with the initial analysis will be reviewed or repeated? (Analyses should be completed when process changes or waste composition changes).	✓			
		INSPECTIONS				
III5(a)	265.15(a)	Does the owner/operator inspect the facility at a reasonable frequency to detectmalfunctions, deteriorations and errors which may threaten the environment and human health?	✓			
5(b)(1)	265.15(b)	Does the owner/operator have a written inspection schedule for inspection of monitoring equipment, safety and emergency equipment operational devices and dikes and sumps etc.		✓		✓

MWNA-WZI 116549

Facility Name: TRENT TUBE

Page 4 of 5

Refer to:			Compliance:			
ISD	40 CFR		Yes	No	N/A	Cmt #
5(b) (4)	265.15(b) (3)	8.10 Does the schedule identify the problem areas to be checked?			✓	
PERSONNEL TRAINING						
6(a) (1)	265.16 (1)	8.11 Does the owner/operator provide classroom or on the job training to facility personnel?	✓			
6(a) (2)	265.16(a) (2)	Are instructors trained in hazardous waste management procedures?	✓			
		Does training include: Foremen - Maint Supt - Trained				
6(a) (3)	265.16(3)	8.11 Emergency response including use of emergency equipment and systems?	✓			
6(b)	265.16(b)	8.12 Has current personnel completed training?	✓			
6(c)	265.16(c)	Is an annual training review conducted?	✓			
		Does the owner/operation maintain following documents and records at the facility:				
6(d) (1)	265.16(d) (1)	Job Title for each position at the facility related to HWM?	✓			
6(d) (2)	265.16(d) (2)	Written job description for each position listed above?	✓			
6(d) (3)	265.16(d) (3)	Written records of the type and amount of introductory and continuing training?	✓			
CONTINGENCY PLAN						
12(a)	265.51	8.14 Does the facility have a contingency plan?	✓			
13(a)	265.52(a)	8.15 Does the contingency plan describe personnel responsibilities and action to be taken in the event of fire, explosion or release of hazardous waste?	✓			
13(c)	265.52(c)	8.15 Does the plan describe agreements with police, fire departments, hospitals, contractors and State and local emergency response teams?	✓			
13(d)	265.52(d)	Does the plan list names, addresses and phone numbers for all emergency coordinators?	✓			
13(e)	265.52(e)	Does the plan list all emergency equipment available at the facility along with its location and capabilities?	✓			

MWNA-WZI 116550



Facility Name: TRENT TUBE

Page 5 of 5

Refer to:			Compliance:			
ISD	40 CFR		Yes	No	N/A	Cmt #
13(f)	265.52(f)	Does the plan include an evacuation plan including signals and alternate routes?	✓			
		Is the plan reviewed and amended when:	✓			
15(b)	265.54(b)	The plan fails in our emergency	✓			
15(c)	265.54(d)	The list of emergency coordinators changes	✓			
15(d)	265.54(e)	The list of emergency equipment changes	✓			
ANNUAL REPORT						
IV-3	265.75	Has the owner/operator prepared an annual report?	✓			
FINANCIAL RESPONSIBILITY						
VI-1(a)	265.142(a)	Have cost estimates for facility closure been prepared?	✓			
1(c)	265.142(b)	Have cost estimates been updated for inflation?	✓			
CLOSURE						
VI-2(a)	265.112(a)	Does the owner/operator have a closure plan?	✓			
		Does the closure plan include:				
2(a)(1)	265.112(a)(1)	Description of how and when the facility partially closed (if applicable) and ultimately closed	✓			
2(a)(2)	265.112(a)(2)	An estimate of the maximum inventory of wastes in storage	✓			
2(a)(3)	265.112(a)(3)	Steps to decontaminate facility, equipment	✓			
2(a)(4)	265.112(a)(4)	A schedule for final closure?	✓			

MWNA-WZI 116551

Facility Name: TRENT TUBE

Page 1 of 2

Refer to:		ISD CHECKLIST: FACILITY WALK THROUGH	Compliance:			
ISD	40 CFR		Yes	No	N/A	Cmt #
II - 1(c)	265.14(a) P. 3	Is hazardous waste stored in a secure enclosure, building, room or fenced area which prevents unauthorized access of persons or live stock onto the active protion of the facility?	✓			
II 1(c)	265.14(c)	Are warning signs in English/Spanish posted and visible?	✓			
II 1(d)	1/	Is the hazardous waste area constructed of an impervious material and designed to contain spills or surface water runoff?	✓			
	265.35	Is sufficient aisle space maintained to allow unobstructed movement of equipment and personnel?	✓			
		IGNITABLE, REACTIVE AND INCOMPATIBLE WASTES				
III-7(a)	265.17(a) P. 13	Does owner/operator take precautions to prevent accidental ignition or reaction of ignitable or reactive waste?	✓			
III-7(a)	265.17(a)	Are "No Smoking" signs dispolayed in hazardous areas? If yes, are these signs located conspicuously?	✓			
		Are these wastes treated, stored, or disposed to prevent:				
III7(b) (1)	265.17(b) (1) P. 13	Generation of heat or pressure, fire or explosion or violent reaction?	✓			
III7(b) (2)	265.17(b) (2)	Production of toxic mists, fumes, dusts, or gases?	✓			
III7(b) (3)	265.17(b) (3)	Production of flammable fumes or gases?	✓			
III7(b) (4)	265.17(b) (4)	Damage to structure of facility?	✓			
III7(b) (5)	265.17(b) (5)	A threat to human health or the environment?	✓			
		SAFETY AND EMERGENCY PROCEDURES				
II-10	P. 6	If the facility is operated at night is it sufficiently lighted?	✓			
II-10 8	265.32(a)	Does the facility have adequate telephone or radio communications to be used in the event of an emergency? <i>radio system</i>	✓			
II-11	"	Are safety showers provided and in workable conditions? <i>Electronic sensor to protect against intruders</i>	✓			
II-12	"	Are eyewashes provided and in workable conditions?	✓			

MWNA-WZI 116552

Facility Name: TRENT TUBE

Page 2 of 2

[illegible]

MWNA-WZI 116553

Facility Name: TRENT TUBE

WALK THROUGH

Page 1 of 1

Refer to:		STORAGE IN CONTAINERS	Compliance:			
ISD	40 CFR		Yes	No	N/A	Cmt #
	P. 4	Are hazardous waste containers stored for more than 90 days labeled as follows:			✓	
II-3(c)(1)		Composition and physical state of waste?			✓	
II-3(c)(2)		Special safety recommendations and for handling?			✓	
II-3(c)(3)		Statements calling attention to the particular hazardous properties of the waste?			✓	
II-3(c)(4)		Amount of waste and name and address of the producer of the waste?			✓	
II-3(c)(5)		Date of acceptance at the facility?			✓	
II-3(d)		Are empty containers contaminated with hazardous materials stored, handled, processed and disposed of as hazardous waste?	✓			
<del>VII</del> IX-2	265.172 P. 30	Are containers compatible with stored wastes in them?	✓			
<del>VII</del> IX-3(a)	265.173 (a)	Are all containers closed?	✓			
<del>VII</del> IX-3(b)	265.173 (b)	Are containers properly handled to prevent rupture or leakage?	✓			
<del>VII</del> IX-5	265.176	Are containers used to store ignitable or reactive waste stored at least 50 feet from the facility's property line?	✓			
<del>VII</del> IX-6(a)	265.177(a)	Are incompatible wastes stored in same containers?			✓	
<del>VII</del> IX-6(b)	265.177(b)	Is hazardous waste added to unwashed containers previously used to store incompatible waste?			✓	
<del>VII</del> IX-6(c)	P. 31 265.177(e)	Are incompatible waste containers physically separated from other waste areas?	✓			

MWNA-WZI 116554

Facility Name: TRENT TUBE

TOFFICE

Page 1 of 1

Refer to:		STORAGE IN TANKS	Compliance:			
ISD	40 CFR		Yes	No	N/A	Cmt #
VII 1(a)	265.192(c) P.25	Do uncovered tanks have a 2 foot freeboard, dikes or containment structures? <i>Process tanks 1-2 days</i>	✓			
VII 1(d)	265.192(d) P.26	If the tank is continuously fed, is there a waste feed cutoff?			✓	
		Are tanks inspected as follows:				
VII 3(a) (1)	265.194(a) (1)	Discharge control daily			✓	
VII 3(a) (2)	265.194(a) (2)	Monitoring equipment daily ( <i>Pressure &amp; Temp gauges</i> )			✓	
VII 3(a) (3)	265.194(a) (3)	Waste level daily	✓			
VII 3(a) (4)	265.194(a) (4)	Construction materials weekly	✓			
VII 3(a) (5)	265.194(a) (5)	Containment construction weekly	✓			
II-2(a)	265.192(c) P.3	Does each above ground hazardous waste storage tank have a spill confinement structure capable of holding the entire contents of the tank plus sufficient freeboard? (2' required)	✓			
II-2(b)	265.172 P.3	Are hazardous waste storage tanks constructed of materials compatible with stored wastes or protected with liners compatible with stored wastes?				
II-2(d)	P.4	Is each hazardous waste storage tank and storage area marked with NFPA hazardous identification placards?				
II-2(e)	P.4	Are valves on hazardous waste storage tanks locked when the facility is unattended?				

*Plant Check*

MWNA-WZI 116555

ISD inspection  
done 4/10/84

M. Buckley

# HAZARDOUS WASTE DISPOSAL REPORT

DUE ON OR BEFORE **MARCH 1, 1984** FOR CALENDAR YEAR **1983**

HA

HA NO 36-DD9D57

Mail to:

STATE BOARD OF EQUALIZATION  
POST OFFICE BOX 647  
SACRAMENTO, CA 95803

TRENT TUBE DIVISION-FULLERTON DPR  
P.O. BOX 3068  
FULLERTON, CA 92634

GENERATING SITE: 2100 E. ORANGETHORPE AVENUE

This report must be filed on or before the due date shown above by every person who submitted for disposal off-site, or who disposed of on-site, hazardous waste or extremely hazardous waste in California during the above calendar year. ANY PERSON WHO KNOWINGLY REFUSES TO FILE THIS REPORT AS REQUIRED SHALL BE LIABLE, UPON CONVICTION, FOR A CIVIL PENALTY PURSUANT TO SECTION 43602 OF THE HAZARDOUS SUBSTANCES TAX LAW.

"HAZARDOUS WASTE" means a waste, or combination of wastes, which because of its quantity, concentration, or physical chemical, or infectious characteristics may either:

- Cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness.
- Pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported, or disposed of, or otherwise managed.

"EXTREMELY HAZARDOUS WASTE" means any hazardous waste or mixture of hazardous wastes which, if human exposure should occur, may likely result in death, disabling personal injury or serious illness caused by the hazardous waste or mixture of hazardous wastes because of its quantity, concentration, or chemical characteristics.

HAZARDOUS WASTE CATEGORIES	TOTAL TONS (To One Decimal)
A. The total tons of HAZARDOUS or EXTREMELY HAZARDOUS waste, the Federal Regulation of which has been suspended under the Solid Waste Disposal Act by Act of Congress, disposed of, or submitted for disposal, in California, plus the total tons of waste material transferred to a surface impoundment in California for the purpose of reducing the water content of such waste and material by evaporation, plus the total tons of hazardous waste disposed of into an injection well or landfarm, exclusive of the waste reported in Section D. (NOTE: LAND FILL DISPOSAL IS NOT LAND FARMING)	- 0 -
B. The total tons of HAZARDOUS waste disposed of, or submitted for disposal, in California exclusive of the waste reported in Sections A, C and D.	35.0 (35.0)
C. The total tons of EXTREMELY HAZARDOUS waste disposed of, or submitted for disposal, in California exclusive of the waste reported in Sections A, B and D.	- 0 -
D. The total tons of HAZARDOUS or EXTREMELY HAZARDOUS waste disposed of, or submitted for disposal, in California from the extraction, beneficiation and processing of ores or minerals including phosphate rock and overburden from mining of uranium ore.	- 0 -

I hereby certify that this report, including any information, schedule and statement, has been examined and found to the best of my knowledge and belief to be a true, correct, and complete report.

SIGNATURE  
AND TITLE

*Harry L. Murphy*  
*Mgr. Quality Assurance*

HA 526-5522 2/7/84  
FOLDER NUMBER DATE

If you have any questions regarding this report, please contact the State Board of Equalization, Excise Tax Unit, Phone: (916) 445-2579.

Please print or type with ELITE type (12 characters per inch).

STATE ID NUMBER

83170051

GENERATOR NAME AND MAILING ADDRESS

TRENT TUBE DIV. - COLT. IND  
P.O. BOX 3068  
FULLERTON, CA 92634  
AREA CODE/PHONE NUMBER 714-526-5522

MANIFEST DOCUMENT NUMBER

EPA ID NUMBER

CADP282251102224

TRANSPORTER NO. 1

KEN'S OIL CO  
P.O. BOX 1239  
GARDEN GROVE, CA 92642

VEH/CONTAINER NO.

EPA ID NUMBER

43667 CADP459139

TRANSPORTER NO. 2/ALTERNATE TSD FACILITY

VEH/CONTAINER NO.

EPA ID NUMBER

TREATMENT, STORAGE, OR DISPOSAL (TSD) FACILITY

BKK  
2210 S. AZUSA  
WEST COVINA, CA 91791  
AREA CODE/PHONE NUMBER 213-965-0911

EPA ID NUMBER

CADP4778674

PROPER U.S. D.O.T. SHIPPING NAME AND HAZARD CLASS

UN/NA  
NUMBER

TOTAL  
QUANTITY

UNIT  
WT/VOL

CONTAINER  
NO. TYPE

WASTE  
CAT. NO. ME

NEUTRALIZED FICOLE LIQUOR  
CORROSIVE LIQUID, N.O.S.

UN1760

1500

G

001CT

1320

COMPONENTS

CONC. RANGE

UPPER

LOWER

UNITS

% PPM

AMMONIUM NITRATE SOLN

12

6

X

AMMONIUM FLUORIDE SOLN

4

2

X

CHROMIUM

1100

300

X

NICKEL

1320

215

X

IRON

1560

400

X

SPECIAL HANDLING INSTRUCTIONS

WEAR GLOVES + GOGGLES

-PH - 7.5  
SPGR 1.12

This is to certify that the above-named wastes are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable requirements of the Department of Transportation and the EPA.

Printed or typed full name and signature

HARRY L. MURPHY  
Harry L. Murphy

MO.

DAY

YR.

11

29

83

☐ Check if continuation sheet is used. Number of continuation sheets

TRANSPORTER 1 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES

Printed or typed full name and signature

MIKE S. LEE  
Mike Lee

DATE  
REC'D  
&  
ACCEPTED

MO.

DAY

YR.

11

29

83

TRANSPORTER 2 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES

Printed or typed full name and signature

DATE  
REC'D  
&  
ACCEPTED

MO.

DAY

YR.

11

29

83

DISCREPANCY INDICATION SPACE

Facility owner or operator: Certification of receipt of hazardous waste covered by this manifest except as noted in the discrepancy indication space above. Note: TSD must complete waste number.

Printed or typed full name and signature

EPA ID NUMBER

DATE RECEIVED & ACCEPTED

MO.

DAY

YR.

11

29

83

TSD RETAINS



please print or type with ELITE type (12 characters per inch).

STATE ID NUMBER 83170069

GENERATOR NAME AND MAILING ADDRESS  
TRENT TUBE DIV - COLT IND  
PO BOX 3068  
FILLETON, CA 92634  
AREA CODE/PHONE NUMBER 714-526-5522

MANIFEST DOCUMENT NUMBER  
EPA ID NUMBER

CAD0083251100000

TRANSPORTER NO. 1  
KENS OIL CO  
PO BOX 1239  
GARDEN GROVE, CA 92642

VEH/CONTAINER NO.

EPA ID NUMBER

CAD046521322

TRANSPORTER NO. 2/ALTERNATE TSD FACILITY

VEH/CONTAINER NO.

EPA ID NUMBER

TREATMENT, STORAGE, OR DISPOSAL (TSD) FACILITY

BKK  
2215 S. ARISA  
WEST COVINA, CA 91791  
AREA CODE/PHONE NUMBER 213-965-0911

EPA ID NUMBER

CAD14778174

PROPER U.S. D.O.T. SHIPPING NAME AND HAZARD CLASS

UN/NA  
NUMBER

TOTAL  
QUANTITY

UNIT  
WT/VOL

CONTAINER  
NO. TYPE

WASTE  
CAT. NO.

NEUTRALIZED FICELLE LIQUOR  
CORROSIVE LIQUID, N.O.S.

UN1260

1600 G

201CT

1320

OIL SLUDGE

UN1268

1300 G

201CT

2220

COMPONENTS

CONC. RANGE

UPPER

LOWER

UNITS

% PPM

AMMONIUM NITRATE SOLN

12

6

X

AMMONIUM FLUORIDE SOLN

4

2

X

CHROMIUM

1100

300

X

NICKEL

1320

215

X

IRON

1560

400

X

CHLORINATED OIL

3

1

X

SPECIAL HANDLING INSTRUCTIONS

WEAR RUBBER GLOVES & GOGGLES

PH-8  
SPER. 1.120

This is to certify that the above-named wastes are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable requirements of the Department of Transportation and the EPA.

Printed or typed full name and signature

HARRY L. MURPHY  
Harry L. Murphy

MO.

DAY

YR.

11

15

83

☐ Check if continuation sheet is used. Number of continuation sheets

TRANSPORTER 1 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES

MIKE SUTIN

DATE  
REC'D  
&  
ACCEPTED

MO.

DAY

YR.

11

16

83

Printed or typed full name and signature

Mike Sutin

TRANSPORTER 2 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES

DATE  
REC'D  
&  
ACCEPTED

MO.

DAY

YR.

Printed or typed full name and signature

DISCREPANCY INDICATION SPACE

Facility owner or operator: Certification of receipt of hazardous waste covered by this manifest except as noted in the discrepancy indication space above. Note: TSD must complete waste number.

DATE RECEIVED & ACCEPTED

EPA ID NUMBER

MO.

DAY

YR.

Printed or typed full name and signature

RAY SIMPSON  
Ray Simpson

CAD046521322

11

16

83

TSD RETAINS

SEE REVERSE SIDES FOR  
INSTRUCTIONS. PLEASE TYPE  
OR PRINT CLEARLY.

PRESS HARD

**CALIFORNIA HAZARDOUS WASTE MANIFEST**  
STATE DEPARTMENT OF HEALTH SERVICES  
HAZARDOUS MATERIALS MANAGEMENT SECTION  
744 P STREET, SACRAMENTO, CA 95814

① MANIFEST  
NUMBER

116000417

**GENERATOR** (GENERATOR MUST COMPLETE)

② NAME City of Tulare  
EPA NO. 10000025-00111  
ADDRESS 210 E. Center Street  
CITY, STATE, ZIP CODE Tulare, CA 93274  
PHONE NO. 714-626-6522  
ORDER PLACED BY BERRY Murphy ORDER DATE 5-3  
CONTRACT NO.

**DESIGNATED TSD FACILITY**

(AUTHORIZED TO OPERATE UNDER AN APPROVED STATE OR FEDERAL PROGRAM)

NAME Donna Chelak  
EPA NO. 10000025-00111  
ADDRESS 210 E. Center Street  
CITY, STATE, ZIP CODE Tulare, CA 93274  
PHONE NO. 714-626-6522

**ALTERNATE TSD FACILITY**

NAME  
EPA NO.  
ADDRESS  
CITY, STATE, ZIP CODE  
PHONE NO.

① U. S. DOT PROPER SHIPPING NAME	U. S. DOT HAZARD CLASS	UN NA ID NO	WEIGHT OR VOLUME	UNITS	CONTAINERS	NUMBER
WASTE <u>III Triethylene Glycol</u>	<u>3</u>	<u>1501</u>	<u>500</u>	<u>gal</u>	<input checked="" type="checkbox"/> DRUMS	<u>1</u>
WASTE					<input type="checkbox"/> TANK TRUCK	

③ WASTE CATEGORY III ④ EX. HAZ. WASTE PERMIT NO. 116000417 ⑤ GENERATING PROCESS Chemical  
⑥ LIST COMPONENTS: CONC. RANGE UPPER LOWER UNITS  
A Triethylene Glycol 100 100 100 PPM  
B Water 10 10 10 PPM  
C Oil 50 50 50 PPM  
D  
⑦ WASTE PROPERTIES: PH 7 ☒ TOXIC ☐ FLAMMABLE ☐ CORROSIVE/IRRITANT ☐ REACTIVE ☐ SENSITIZER ☐ CARCINOGEN/MUTAGEN  
⑧ PHYSICAL STATE ☐ SOLID ☒ LIQUID ☐ SLUDGE ☐ SLURRY ☐ GAS ☐ OTHER  
⑨ SPECIAL HANDLING INSTRUCTIONS ☒ GLOVES ☐ GOGGLES ☐ RESPIRATOR ☐ OTHER

GENERATOR CERTIFICATION: THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED & LABELED, AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION AND THE EPA.

IN THE EVENT OF A SPILL CONTACT THE NATIONAL  
RESPONSE CENTER, U. S. COAST GUARD 1-800-424-8802.

SIGNATURE OF AUTHORIZED AGENT & TITLE  
DATE SHIPPED

**TRANSPORTER** (HAULER MUST COMPLETE)

① NAME Industrial Waste Utilization  
EPA NO. C A D 9 8 0 5 8 5 2 9 3  
ADDRESS P.O. Box 1163  
City, State, ZIP Code Brea, California 92621  
PHONE NO. (714) 529-3237

JOB NO.  
UNIT NO.

② PICK UP DATE 5-5-83  
TIME 1:00 ☐ AM ☐ PM

SIGNATURE OF AUTHORIZED AGENT & TITLE

**TSD FACILITY** (OPERATOR MUST COMPLETE)

① NAME Donna Chelak ② QUANTITY IF MEASURED  
EPA NO. 10000025-00111 ③ STATE FEE, IF ANY \$

④ INDICATE ANY SIGNIFICANT DISCREPANCIES BETWEEN MANIFEST AND SHIPMENT

⑤ IF WASTE IS HELD FOR DELIVERY ELSEWHERE, SPECIFY THE DESIGNATED TSD FACILITY

NAME  
EPA NO.  
REVISED 11/80

⑥ HANDLING OR DISPOSAL METHOD  
☐ SURFACE IMPOUNDMENT ☐ LANDFILL  
☐ INJECTION WELL ☐ LAND TREATMENT  
☒ TREATMENT (SPECIFY)  
☒ RECOVERY OR REUSE ☐ STORAGE/TRANSFER

SIGNATURE OF AUTHORIZED AGENT & TITLE  
DATE ACCEPTED

DHS 8022 (2/81)

MWNA-WZI 116560

HAZARDOUS MATERIALS MANAGEMENT  
SECTION  
744 P Street  
Sacramento, CA 95814

## UNIFORM HAZARDOUS WASTE MANIFEST

(Please print or type with ELITE type (12 characters per inch).)

STATE ID NUMBER **8279876**

GENERATOR NAME AND MAILING ADDRESS

TRENT TUBE DIV. - COLT IND.  
2100 E ORANGETHORPHE AVE  
FULLERTON CA 92634  
AREA CODE/PHONE NUMBER 714-576-5522

MANIFEST DOCUMENT NUMBER

EPA ID NUMBER

CADO0832511000002

TRANSPORTER NO. 1

LAKELWOOD OIL SERVICE

VEH./CONTAINER NO.

EPA ID NUMBER

11020 S. BLOOMFIELD  
SANTA FE SPRINGS CA 92634  
TRANSPORTER NO. 2/ALTERNATE TSD FACILITY

4392618

CADO09677808

EPA ID NUMBER

TREATMENT, STORAGE, OR DISPOSAL (TSD) FACILITY

LAKELWOOD OIL SERVICE  
11020 S. BLOOMFIELD  
SANTA FE SPRINGS CA  
AREA CODE/PHONE NUMBER 714-576-5522

EPA ID NUMBER

CADO990769085

PROPER U.S. D.O.T. SHIPPING NAME AND HAZARD CLASS

UN/NA  
NUMBERTOTAL  
QUANTITYUNIT  
WT/VOLCONTAINER  
NO. TYPEWASTE  
CAT. NO.

KEROSENE

UNY223

150

G

TC221

NAPHTHA SOLVENT (MINERAL SPIRITS)

UN1256

150

G

TC221

COMPONENTS

CONC.  
UPPERRANGE  
LOWERUNITS  
% ppm

Kerosene

80

65

%

Naphtha

80

60

%

SPECIAL HANDLING INSTRUCTIONS

Combustable Liquid  
Avoid open flame

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

PRINTED OR TYPED FULL NAME AND SIGNATURE

HARRY L. MURPHY

MO. DAY YR.

05 09 83

☐ CHECK IF CONTINUATION SHEET IS USED. NUMBER OF CONTINUATION SHEETS

TRANSPORTER'S ACKNOWLEDGEMENT OF RECEIPT OF ABOVE MATERIALS

DATE REC'D &amp; ACCEPTED

PRINTED OR TYPED FULL NAME AND SIGNATURE

Charles L. Houghton, Charles E. Houghton

MO. DAY YR.

05 09 83

TRANSPORTER'S ACKNOWLEDGEMENT OF RECEIPT OF ABOVE MATERIALS

DATE REC'D &amp; ACCEPTED

PRINTED OR TYPED FULL NAME AND SIGNATURE

MO. DAY YR.

DISCREPANCY INDICATION SPACE

Facility owner or operator: Certification of receipt of hazardous material covered by this manifest except as noted in the discrepancy indication space above. Note: TSD must complete waste number. See instructions.

DATE REC'D &amp; ACCEPTED

PRINTED OR TYPED FULL NAME AND SIGNATURE

EPA ID NUMBER

MO. DAY YR.

Original—White—Disposer send to DHS; Green—Hauler; Yellow—Disposer; Pink—Generator

DHS 8022 (7/82)

MWNA-WZI 116561

## HAZARDOUS MATERIALS MANAGEMENT

## IFORM HAZARDOUS WASTE MANIFEST

SECTION

744 P Street  
Sacramento, CA 95814

11/17/83

(Please print or type with ELITE type (12 characters per inch).)

STATE ID NUMBER **8279872**

## GENERATOR NAME AND MAILING ADDRESS

TRENT TUBE DIV-COLT IND OP. GRP.

P.O. BOX 3068

FULLERTON, CA 92634

TRANSPORTER NO. 1

KENS OIL CO. P.O. BOX 1239

GARDEN GROVE CA 92641-8841

## MANIFEST DOCUMENT NUMBER

EPA ID NUMBER

CAD000832511000001

## VEH./CONTAINER NO.

EPA ID NUMBER

2934 CAD0046591392

## TRANSPORTER NO. 2/ALTERNATE TSD FACILITY

EPA ID NUMBER

## TREATMENT, STORAGE, OR DISPOSAL (TSD) FACILITY

BKK 2210 S AZUSA

WEST COVINA, CA 91791

AREA CODE/PHONE NUMBER 213 965-0711

EPA ID NUMBER

CAD0267786749

## PROPER U.S. D.O.T. SHIPPING NAME AND HAZARD CLASS

## UN/NA NUMBER

## TOTAL QUANTITY

## UNIT WT/VOL

## CONTAINER NO. TYPE

## WASTE CAT. NO.

(CORROSIVE LIQUID NOS.)  
NEUTRALIZED SPENT ACID

UN1760

3800

G

201 CT

1312

OIL SLUDGE

UN1760

200

G

201 CT

222

## COMPONENTS

## CONC. UPPER

## RANGE LOWER

## %

## UNITS ppm

AMMONIUM NITRATE SOLN.

12

6

X

AMMONIUM FLUORIDE SOLN.

4

2

X

CHROMIUM

1100

300

X

NICKEL

1320

250

X

IRON

1560

400

X

CHLORINATED OIL

3

1

X

## SPECIAL HANDLING INSTRUCTIONS

Sample submitted for analysis  
5-19-83PH 6.0  
SPGR 110

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

HARRY L. MURPHY

PRINTED OR TYPED FULL NAME AND SIGNATURE

Harry L. Murphy

MO. DAY YR.

03 14 83

☐ CHECK IF CONTINUATION SHEET IS USED. NUMBER OF CONTINUATION SHEETS

## TRANSPORTER 1 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE MATERIALS

DATE REC'D &amp; ACCEPTED

N. L. S. S. S. S.

PRINTED OR TYPED FULL NAME AND SIGNATURE

N. L. S. S. S.

MO. DAY YR.

03 14 83

## TRANSPORTER 2 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE MATERIALS

DATE REC'D &amp; ACCEPTED

PRINTED OR TYPED FULL NAME AND SIGNATURE

MO. DAY YR.

03 14 83

## DISCREPANCY INDICATION SPACE

0

Facility owner or operator: Certification of receipt of hazardous material covered by this manifest except as noted in the discrepancy indication space above. Note: TSD must complete waste number. See instructions.

DATE REC'D &amp; ACCEPTED

PRINTED OR TYPED FULL NAME AND SIGNATURE

Ray Simpson

EPA ID NUMBER

MO. DAY YR.

03 14 83

Original—White—Disposer send to DHS; Green—Hauler; Yellow—Disposer; Pink—Generator

DHS 8022 (7/82)

MWNA-WZI 116562

# CHEMICAL CONSULTANTS

1160 CENTRE DRIVE  
INDUSTRY, CALIFORNIA 91789  
(714) 596-7473 - (213) 985-7122

---

**A REPORT PREPARED FOR:**

TRENT TUBE

2100 E. Orangethorpe

Fullerton, CA. 92634

DATE: March 25, 1982

RECEIVED: 3/12/82

CUSTOMER P.O.: 14793F

LOG NO.: P-0700

---

**TYPE MATERIAL TESTED:**

(1) Sample of neutralized spent pickle liquor  
provided by customer.

**REASON FOR TEST:**

Determine applicable constituents.

## RESULTS

pH	6.5 units
Chromium - total	262.0 mg/l
Iron - total	1,100.0 mg/l
Nickel - total	1,700.0 mg/l
Specific gravity	1.070
Ammonium Fluoride	1.74%
Ammonium BiFluoride	0.04%

Respectfully submitted,

*Robert C. Anderson*

CHEMICAL CONSULTANTS

This report relates only to the materials tested and should not be construed to indicate the quality or condition of apparently identical or similar material. In an effort to provide joint protection for clients, the general public and this laboratory, this report is prepared for the sole use of customer to whom it is addressed and is accepted by that party under these conditions, further it may not be used in whole or in part in any publicity or advertising venture without prior written permission from an officer of this laboratory.

MWNA-WZI 116563

# CHEMICAL CONSULTANTS

1180 CENTRE DRIVE  
INDUSTRY, CALIFORNIA 91789  
(714) 595-7473 - (213) 985-7122

---

**A REPORT PREPARED FOR:**

TRENT TUBE

2100 E. Orangethorpe

Fullerton, CA. 92634

DATE: December 1, 1981

RECEIVED: 11/10/81

CUSTOMER P.O.: 14564 F

LOG NO.: W-9981

---

**TYPE MATERIAL TESTED:**

Neutralized Spent Pickle Liquor  
Cake in bottom of Pickle tank after neutralization

**REASON FOR TEST:**

Determine constituents

## RESULTS

### NEUTRALIZED SPENT PICKLE LIQUOR

pH	7.4	units
Specific gravity	1,090	
Chromium (total)	1,200	mg/l
Hexavalent Chrome	570.0	mg/l
Trivalent Chrome	630.0	mg/l
Nickel	1,440	mg/l
Iron	1,700	mg/l
Ammonium Fluoride	2.9	%
Ammonium Bifluoride	None detected	

### CAKE IN BOTTOM OF PICKLE TANK AFTER NEUTRALIZATION

Calcium	0.01% by dry wt.
Nickel	0.19% by dry wt.
Chromium	1.81% by dry wt.
Iron	36.06% by dry wt.

Respectfully submitted,

JEFF JOLICOEUR

---

CHEMICAL CONSULTANTS

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MWNA-WZI 116564

# CHEMICAL CONSULTANTS

1160 CENTRE DRIVE  
INDUSTRY, CALIFORNIA 91789  
(714) 595-7473 - (213) 985-7122

---

**A REPORT PREPARED FOR:**

TRENT TUBE

2100 E. Orangethorpe

Fullerton, CA. 92634

---

DATE: September 28, 1979

RECEIVED: 9/14/79

CUSTOMER P.O.: 12258- F

LOG NO.: P-5268

---

TYPE MATERIAL TESTED: Spent Pickle Acid

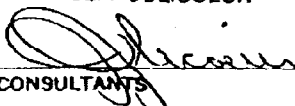
REASON FOR TEST: Determine Constitutents

## RESULTS

pH	8.5
Chromium - total	670.0 mg/l - $.670 \text{ g/l} = .00067 \text{ g/cc}$
Copper - total	37.2 mg/l
Iron - total	14.0 mg/l
Nickel - total	2,540.0 mg/l $.25\% \text{ by wt.}$
Zinc - total	2.1 mg/l
Calcium	380 grain/gallons
Nitrate	880. mg/l
Fluoride	26,000.0 mg/l
% Solids	15.64 %

Respectfully submitted,

JEFF JOLICOEUR

  
CHEMICAL CONSULTANTS

This report relates only to the materials tested and should not be construed to indicate the quality or condition of apparently identical or similar material. In an effort to provide joint protection for clients, the general public and this laboratory, this report is prepared for the sole use of customer to whom it is

MWNA-WZI 116565